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 6 LYNDA JANES DANGERFIELD

7
 8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA
 10 SAN FRANCISCO DIVISION

11
 12 LYNDA JANES DANGERFIELD,

13 Plaintiff,

14 v.

15 SUE FOX, and ETIQUETTE
 16 SURVIVAL LLC and DOES 1
 through 50,

17 Defendants.

Case No. 3:09-cv-04397-JSC (EDL)

**JOINT STIPULATION AND
 REQUEST TO EXTEND
 DISCOVERY DEADLINES AND
 [PROPOSED] ORDER**

18 AND RELATED COUNTERCLAIM
 19

20
 21 Come Now LYNDA JANES DANGERFIELD, SUE FOX, and ETIQUETTE
 22 SURVIVAL LLC (collectively, the "Parties"), by and through their respective
 23 counsel of record, and hereby submit this Joint Stipulation and request to Extend
 24 the Non-Expert Discovery and Discovery Motion Deadlines to March 1, 2012 and
 25 March 8, 2012, respectively.

26 WHEREAS, the Parties previously participated in a Settlement Conference
 27 with former Magistrate Chen, which remained incomplete when the magistrate was
 28 elevated to a full Article III judgeship;

1 WHEREAS, the Court reassigned the matter to Magistrate Laporte to
2 complete an early Settlement Conference;

3 WHEREAS, by Stipulated Order dated July 18, 2011, Non-Expert discovery
4 cut-off was set for January 31, 2012 and the last day to file a discovery motion
5 related to Non-Expert discovery was February 7, 2012;

6 WHEREAS, the Settlement Conference was scheduled for January 27, 2012,
7 but due to the magistrate's subsequent unavailability, had to be continued until
8 March 30, 2012;

9 WHEREAS, the Non-Expert discovery cut-off and Motion Deadline were
10 scheduled, in part, due to the anticipated date for the parties' Settlement Conference
11 in or before January, 2012;

12 WHEREAS, by prior agreement of the parties, documents were to be
13 produced no later than ten days prior to the Settlement Conference;

14 WHEREAS, Plaintiff was unavailable for deposition in late January, but has
15 agreed to be available in February, and the Parties are working to complete this
16 discovery during the month of February;

17 THEREFORE, the Parties respectfully request that the Non-Expert
18 Discovery and Discovery Motion Deadlines be extended by one month to March 1,
19 2012 and March 8, 2012, respectively, to allow for the completion of their
20 discovery.

21 IT IS SO STIPULATED.

22
23 Dated: February 7, 2012

BURKE, WILLIAMS & SORENSEN, LLP

24
25 By: 

Douglas W. Dal Cielo

Brian M. Affrunti

Attorneys for Plaintiff/Cross-Defendant
LYNDA JANES DANGERFIELD

1 Dated: February 7, 2012

THE MORALES LAW FIRM

3 By: /s/ David P. Morales

4 David P. Morales
5 Attorney for Defendant/Cross-
6 Complainant SUE FOX and Defendant
7 ETIQUETTE SURVIVAL LLC

11 **[PROPOSED] ORDER**

12 The Court, having read and considered the Joint Stipulation to Extend
13 Discovery Deadlines, and Good Cause appearing therefore, hereby Orders as
14 follows:

15 The Parties shall complete all Non-Expert discovery on or before March 1,
16 2012.

17 All motions concerning Non-Expert discovery shall be filed on or before
18 March 8, 2012.

21 Dated: 2/7/2012

22 
23 UNITED STATES MAGISTRATE JUDGE
24 Jacqueline Scott Corley