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CHRISTINA TRUJILLO

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

CHRISTINA TRUJILLO,

Plaintiff,

v.

GT USA, INC.,

Defendant.

Case No. CV 09-05179 MMC

**STIPULATED REQUEST & ~~PROPOSED~~
ORDER EXTENDING DISCOVERY &
EXPERT DEADLINES; DECLARATION
OF ROBERT M. LIEBER**

[Fed. R. Civ. Proc. 29(b); Civ. L.R. 6-2]

Action Filed: November 2, 2009
Trial Date: February 22, 2011

GT USA, INC.,

Counterclaimant,

v.

CHRISTINA TRUJILLO,

Counterdefendant.

1 **STIPULATION OF THE PARTIES**

2 WHEREAS, pursuant to the Court’s Pretrial Preparation Order dated March 29, 2010
3 (docket no. 29), the non-expert discovery cutoff is currently September 10, 2010, the deadline to
4 designate experts is October 1, 2010, the deadline to designate rebuttal experts is October 15, 2010,
5 and the expert discovery cutoff is November 5, 2010;

6 WHEREAS, the Parties wish to engage in mediation to determine if settlement of this case
7 without trial is possible before engaging in extensive discovery or incurring expert fees;

8 WHEREAS, the mediation of this action has been scheduled to occur on September 15,
9 2010;

10 WHEREAS, because of the trial and vacation schedules of the Parties’ counsel and the
11 assigned mediator, and because Defendant’s representative resides in Italy, it was not feasible to
12 hold the mediation earlier;

13 WHEREAS, the discovery and expert deadlines have not previously been extended in this
14 case;

15 WHEREAS, continuing these deadlines would not delay the trial date or otherwise affect the
16 schedule for this case;

17 THEREFORE, pursuant to Federal Rule of Civil Procedure 29(b) and Civil Local Rule 6-2,
18 the parties to this action, by and through their counsel of record, do HEREBY STIPULATE AND
19 REQUEST THE COURT TO ORDER as follows:

20 (1) The non-expert discovery cutoff is extended from September 10, 2010 to November 10,
21 2010;

22 (2) The deadline to designate experts is extended from October 1, 2010 to December 1,
23 2010;

24 (3) The deadline to designate rebuttal experts is extended from October 15, 2010 to
25 December 15, 2010; and
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