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1 Angela M. Taylor (CA Bar No. 210425)
 angelataylor@jonesday.com
 2 Eric J. Hardeman (SBN 253489)
 ejhardeman@jonesday.com
 3 JONES DAY
 3 Park Plaza, Suite 1100
 4 Irvine, CA 92614
 Telephone: (949) 851-3939
 5 Facsimile: (949) 553-7539

6 Attorneys for Defendant
 EXPERIAN INFORMATION SOLUTIONS,
 7 INC.

8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA

11 **HEIDI GITTERMAN,**

12 **Plaintiff,**

13 **v.**

14 **EXPERIAN INFORMATION**
SOLUTIONS, INC.,

15 **Defendant.**

Case No. CV-09-05382 RS

STIPULATION TO EXTEND
DEADLINES AND [~~PROPOSED~~]
ORDER

[LOCAL RULE 6-1]

17 Plaintiff Heidi Gitterman (“Plaintiff”) and Defendant Experian Information Solutions, Inc.
 18 (“Experian”), by and through their respective attorneys of record, hereby STIPULATE to modify
 19 the Court’s Case Management Scheduling Order (Docket No. 27) to extend the deadline for
 20 completion of non-expert discovery from March 15, 2011, by sixty days, to May 14, 2011.

21 Good cause exists to extend the discovery deadline because the parties’ counsel were
 22 unable to coordinate written discovery and depositions due to scheduling conflicts with their
 23 respective counsel. Daniel Dobrygowski, Experian’s former attorney in this case, has recently
 24 left the law firm of Experian’s counsel, Jones Day, and was also unavailable to coordinate
 25 discovery at the beginning of this year after his wife gave birth. In addition, Plaintiff’s attorney
 26 Christopher Saldaña was involved in two trials in southern California lasting approximately two
 27 months at the beginning of this year. This is the first request by the parties to extend the pre-trial
 28 deadlines in this case, and the parties submit that all non-expert discovery will be completed on or

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before May 14, 2011.

Dated: March 1, 2011

JONES DAY

By: /s/ Eric J. Hardeman
Eric J. Hardeman

Attorneys for Defendant
EXPERIAN INFORMATION SOLUTIONS,
INC.

Dated: March 1, 2011


SHEWRY & VAN DYKE, LLP

By: /s/ Christopher C. Saldaña
Christopher C. Saldaña

Attorneys for Plaintiff
HEIDI GITTERMAN

IT IS SO ORDERED.

Dated: 3/2, 2011


UNITED STATES DISTRICT JUDGE
NORTHERN DISTRICT OF CALIFORNIA