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16 Attorneys for Plaintiff
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18 UNITED STATES DISTRICT COURT
19 NORTHERN DISTRICT OF CALIFORNIA
20 SAN FRANCISCO DIVISION

21 MARK DAVID BAKHIT,

22 Plaintiff,

23 v.

24 POLAR AIR CARGO,

25 Defendant.
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Case No. CV-10-01927-BZ

**STIPULATION & [PROPOSED] ORDER
CONTINUING DEADLINE FOR INITIAL
DISCLOSURES**

**[Fed. R. Civ. Proc. 26(a)(1), 29(b); Civ. L.R.
6-2]**

Action Filed: May 4, 2010

Trial Date: December 5, 2011

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STIPULATION OF THE PARTIES

WHEREAS, the deadline for initial disclosures in this case is currently set at December 13, 2010, pursuant to the parties' stipulation and the Court's November 30, 2010 scheduling order (docket no. 31);

WHEREAS, Federal Rule of Civil Procedure 26(a)(1)(A) provides that the deadline to make initial disclosures may be "as otherwise stipulated or ordered by the court";

WHEREAS, Federal Rule of Civil Procedure 29(b) provides that parties may stipulate to modify discovery procedures;

WHEREAS, the parties have stipulated to allow Plaintiff to file a Second Amended Complaint, and Plaintiff's counsel will be providing the proposed amended Complaint to Defendant's counsel shortly;

WHEREAS, the parties desire additional time to prepare initial disclosures;

WHEREAS, this case is scheduled for trial on December 5, 2011, and continuing the initial disclosure deadline will not delay the trial date or otherwise affect the schedule for this case;

THEREFORE, the parties to this action, by and through their counsel of record, do hereby stipulate and request the Court to order that the deadline to serve initial disclosures is continued from December 13, 2010 to and including December 23, 2010.

IT IS SO STIPULATED.

Dated: December 10, 2010

MARGOLIS & TISMAN LLP
By: /s/ Mike Margolis
MIKE MARGOLIS
Attorneys for Defendant
POLAR AIR CARGO WORLDWIDE, INC.

Dated: December 10, 2010

LAW OFFICES OF ROBERT LUBIN
By: /s/ Robert M. Lubin
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MARK DAVID BAKHIT

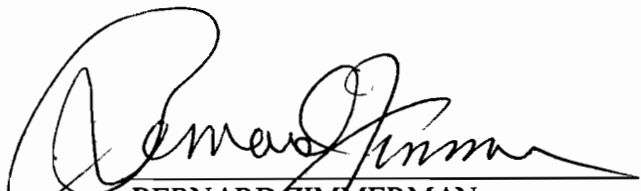
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~~PROPOSED~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

The deadline to serve initial disclosures is continued from December 13, 2010 to and including December 23, 2010.

DATED: 10 Dec 2010



BERNARD ZIMMERMAN
United States Magistrate Judge