1 2 3 4 5 6	STEPHEN F. VON TILL (State Bar No. 4721' ONDREJ LIKAR (State Bar No. 260199) VON TILL & ASSOCIATES 152 Anza Street, Suite 220 Fremont, California 94539 Telephone: (510) 490-1100 Facsimile: (510) 490-1102 Attorney for Plaintiff GARY REYNOLDS	7)	
7	MICHAEL BARNES (State Bar No. 121314)		
8	SONIA MARTIN (State Bar No. 191148) CYNTHIA LIU (State Bar No. 263270)		
9	SNR DENTON US LLP		
10	2121 N. California Blvd., Suite 800Walnut Creek, California 94596Telephone: (925) 949-2600Facsimile: (925) 949-2610Email: michael.barnes@snrdenton.comsonia.martin@snrdenton.com		
11			
12			
13	cynthia.liu@snrdenton.com		
14	Attorneys for Defendant ALLSTATE INSURANCE COMPANY		
15			
16	UNITED STATES DISTRICT COURT		
17	NORTHERN DISTRICT OF CALIFORNIA		
18	SAN FRANCISCO DIVISION		
19	GARY V. REYNOLDS,	No. 10 CV 04893 SI	
20	Plaintiff,	CTIDUI ATION AND (POOPOCED)	
21	vs.	STIPULATION AND [PROPOSED] ORDER EXTENDING CERTAIN	
22	ALLSTATE INSURANCE COMPANY, JANICE L. COSTANZO, and DOES ONE	PRETRIAL DEADLINES	
23	through TWENTY, inclusive,		
24	Defendants.		
25			
26			
27			
28			
		1- STIPULATION EXTENDING CERTAIN PRETRIAL DEADLINES	

1	The parties, by and through their respective counsel of record, hereby stipulate and agree		
2	as follows and respectfully request that the Court approve and give effect to their stipulation:		
3	WHEREAS the Court has set the following discovery deadlines:		
4	Non-expert discovery cut-off: May 12, 2011		
5	Dispositive motion filing: July 8, 2011 (pltf); July 22, 2011 (deft)		
6	Dispositive motion hearing: September 2, 2011		
7	Expert disclosures: May 19, 2011		
8	Rebuttal expert disclosures: May 26, 2011		
9	Expert discovery cut-off: June 10, 2011		
10	WHEREAS, plaintiff's counsel has two trials scheduled in May 2011;		
11	WHEREAS, plaintiff and non-party Janice L. Costanzo currently reside in Colorado;		
12	WHEREAS, due to the schedules of the parties, they have been unable to find a mutually		
13	agreeable date for plaintiff's and non-party Janice L. Costanzo's depositions prior to May 12,		
14	2011;		
15	WHEREAS, a continuance of certain discovery deadlines will not affect any other case		
16	management dates set by the Court, including the trial date;		
17	IT IS HEREBY STIPULATED AND AGREED that the pretrial deadlines should be		
18	modified as follows:		
19	Non-expert discovery cut-off June 30, 2011		
20	///		
21	///		
22	///		
23	///		
24	///		
25	///		
26	///		
27	///		
28	///		
	-2- Case No. 10 CV 04893 SI -2- CERTAIN PRETRIAL DEADLINES		

1	Expert discovery cut-off:	June 30, 2011
2	IT IS SO STIPULATED.	
3	FILER'S ATTESTATION:	
4	Pursuant to General Order No. 45	5, section X(B) regarding signatures, I attest under
5	penalty of perjury that the concurrence in the filing of this document has been obtained from its	
6	signatories.	
7	Dated: April 14, 2011	By/ <u>s/ CYNTHIA LIU</u> CYNTHIA LIU
8		CYNTHIA LIU
9		Respectfully Submitted,
10	Dated: April 14, 2011	VON TILL & ASSOCIATES
11		
12		
13		By <u>/s/ ONDREJ LIKAR</u> ONDREJ LIKAR
14		Attorney for Plaintiff GARY V. REYNOLDS
15		GARY V. REYNOLDS
16	Dated: April 14, 2011	SNR DENTON US LLP
17		
18		By <u>/s/ SONIA MARTIN</u> SONIA MARTIN
19		Attorneys for Defendant
20		ALLSTATE INSURANCE COMPANY
21		
22	IT IS SO ORDERED.	
23	Dated: 4/15 . 2011	
24	Dated:4/15, 2011	Suran Delaton
25		The Hon. Susan Illston
26		
27		
28		-3-
	Case No. 10 CV 04893 SI	STIPULATION EXTENDING