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20 Attorneys for Defendants
 21 WATSON PHARMACEUTICALS and
 22 WATSON PHARMACEUTICALS (NEW JERSEY), INC.

23 UNITED STATES DISTRICT COURT
 24 NORTHERN DISTRICT OF CALIFORNIA

25 ANNE ALBRECHT, an individual,

26 Plaintiff,

27 vs.

28 WATSON PHARMACEUTICALS, a
 Delaware Corporation; WATSON
 PHARMACEUTICALS (NEW JERSEY),
 INC., a New Jersey Corporation; and DOES 1
 through 50, inclusive,

Defendants.

Case No. CV 10-05272 TEH

**STIPULATION AND (PROPOSED)
 ORDER CONTINUING DATE OF
 DEPOSITION DISCOVERY CUTOFF**

Complaint Filed: September 8, 2010
 Trial Date: July 10, 2012

1 **WHEREAS**, the trial of this matter is currently set for July 10, 2012;

2 **WHEREAS**, December 31, 2011 was the discovery cutoff date;

3
4 **WHEREAS**, the Court previously approved a stipulation allowing the parties to extend
5 the discovery cutoff for depositions until January 31, 2012 in order to conduct a mediation on
6 December 14, 2011;

7 **WHEREAS**, the case did not settle at the December 14 mediation but the parties desire
8 to continue mediation of the matter and have confirmed with the mediator that they will be able
9 to do so on or before February 10, 2012;

10 **WHEREAS**, the parties have an expectation that the matter may resolve at the second
11 day of mediation;

12 **WHEREAS**, the parties have scheduled over 15 depositions for the month of January,
13 beginning Monday, January 9, and wish to take those depositions off calendar pending potential
14 settlement of this matter at mediation;

15 **WHEREAS**, based on counsel's schedules, if no settlement occurs, the parties will have
16 to reschedule depositions for February and early March;

17 **WHEREAS**, given the July 10, 2012 trial date, the parties believe that other major pre-
18 trial dates can be continued without impacting ~~either~~ the trial date;

19 **THEREFORE, THE PARTIES, BY AND THROUGH THEIR ATTORNEYS OF**
20 **RECORD, HEREBY STIPULATE AND AGREE:**

- 21
22
23 **1.** To continue the discovery cut-off for depositions to **March 5, 2012** so long as any
24 such depositions are noticed prior to **February 6, 2012**.
25
26 **2.** To the following schedule for other pretrial dates and for briefing of dispositive
27 motions;
28

- Pretrial motions hearing (Last day to hear pretrial motions except motions in limine): April 23
- Last day for filing dispositive motions: March 12
- Expert Discovery Cutoff: April 15
- Pretrial conference: June 25 (no change requested for this date)
- Trial: July 10 (no change requested for this date)
- Deadline for filing opposition to dispositive motions: April 2
- Deadline for filing reply to dispositive motion: April 9

SO STIPULATED,

DATED: January 6, 2011

LAW OFFICES OF JENNIFER SCHWARTZ

By: _____ /S/
 Jennifer Schwartz
 Attorney for Plaintiff
 ANNE ALBRECHT

DATED: January 6, 2011

OGLETREE, DEAKINS, NASH, SMOAK &
 STEWART, P.C.

By: _____ /S/
 Mary E. Wright
 Attorneys for Defendants
 WATSON PHARMACEUTICALS et al.

IT IS SO ORDERED.

DATED: 01/09/2012

