

1 Craig E. Lindberg (Bar No. 150778)
FEDERAL EXPRESS CORPORATION
 2 2601 Main Street, Suite 340
 Irvine, California 92614
 3 Telephone: (949) 862-4678
 Facsimile: (949) 862-4605
 4 E-mail: craig.lindberg@fedex.com

5 Attorneys for Defendant
FEDERAL EXPRESS CORPORATION

6
 7
 8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA

11 JACQUELINE BAKER,
 12 Plaintiff,

13 v.

14 FEDERAL EXPRESS
 CORPORATION,
 15 Defendant.

Case No. C 10-05741 JSW

**JOINT STIPULATION TO EXTEND
 DISCOVERY CUTOFF FOR THE
 LIMITED PURPOSE OF
 COMPLETING THE DEPOSITIONS
 OF PLAINTIFF JACQUELINE
 BAKER AND JOSEPH MACHADO,
 AND [PROPOSED] ORDER
 THEREON**

Complaint Filed: September 20, 2010
 Trial Date: March 5, 2012

19
 20 Plaintiff Jacqueline Baker and Defendant Federal Express Corporation submit
 21 the following Joint Stipulation to Extend the Discovery Cutoff Date for the Limited
 22 Purpose of Completing the Depositions of Plaintiff Jacqueline Baker and Joseph
 23 Machado, an employee of Federal Express Corporation. The parties believe good
 24 cause exists for the Court to approve the Joint Stipulation.

25 **FACTS**

- 26 1. The discovery cut-off in this case is October 3, 2011;
 27 2. The parties agreed Plaintiff would depose Mr. Machado on Tuesday,
 28 September 27, 2011.

1 3. The parties also agreed FedEx would conduct the second day of Plaintiff
2 Baker's deposition on Wednesday, September 28, 2011;

3 4. Although the parties attempted to schedule the depositions so they would
4 be completed before the discovery cut-off date, counsel for FedEx, Craig E. Lindberg,
5 Esq., has a family emergency that precludes him from attending the depositions on the
6 dates previously scheduled;

7 5. Specifically, as a result of a family emergency, Mr. Lindberg's wife had
8 to leave the country last Tuesday, and she will not return until late next Tuesday
9 evening, at the earliest. Mr. Lindberg would have gone with her, but he had to stay
10 home to take care of his two children. As a result, he is unable to travel to San
11 Francisco on the dates previously agreed upon;

12 6. As a result of Mr. Lindberg's family emergency and inability to attend
13 the depositions on the dates previously scheduled, the parties have agreed that
14 Plaintiff Baker will depose Mr. Machado on Wednesday, October 5, 2011;

15 7. The parties have also agreed that FedEx will depose Ms. Baker on
16 Thursday, October 6, 2011;

17 8. The two dates are the first dates on which all parties are available;

18 9. Consequently, the parties jointly request that the discovery cut-off date
19 be extended for the limited purpose of allowing both parties to complete the two
20 depositions set forth above.

21 **STIPULATION**

22 1. The parties stipulate and agree to extend the discovery cut-off date for the
23 limited purpose of allowing both parties to complete the depositions of Joseph
24 Machado and Plaintiff Jacqueline Baker as set forth above;

25 2. The parties stipulate and agree that Plaintiff Baker will depose Mr.
26 Machado on Wednesday, October 5, 2011;


27 3. The parties stipulate and agree that FedEx will depose Ms. Baker on
28 Thursday, October 6, 2011; and

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

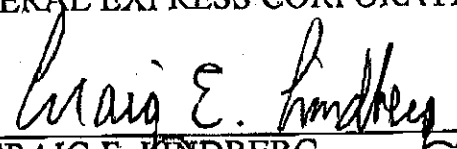
4. The parties submit that Mr. Lindberg's family emergency constitutes good cause.

DATED: 9/26/2011

Respectfully submitted,
LAW OFFICES OF WAUKEEN Q. MCCOY

By: 
WAUKEEN Q. MCCOY
Attorneys for Plaintiff
JACQUELINE BAKER

DATED: 9/23/11


FEDERAL EXPRESS CORPORATION
By: 
CRAIG E. LINDBERG
Attorneys for Defendant
FEDERAL EXPRESS CORPORATION

ORDER

Good cause appearing therefore, the Court hereby Orders that the discovery cut-off date is extended for the limited purpose of allowing both parties to complete the depositions of Joseph Machado and Plaintiff Jacqueline Baker as set forth above.

IT IS SO ORDERED

DATED: September 27, 2011


THE HONORABLE JEFFREY S. WHITE
UNITED STATES DISTRICT COURT JUDGE