

1 Michael R. Bracamontes (SBN 242655)
2 Ryan J. Vlasak (SBN 241581)
3 Kristen M. Ross (SBN 250917)
4 BRACAMONTES & VLASAK, P.C.
5 220 Montgomery Street, Suite 870
6 San Francisco, CA 94104
7 Phone: (415) 835-6777
8 Fax: (415) 835-6780
9 mbracamontes@bvlawsf.com

10 Attorneys for Plaintiff Chi Nguyen

11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 SAN FRANCISCO DIVISION

14 CHI NGUYEN,
15 Plaintiff,
16 vs.
17 CLEAN HARBORS ENVIRONMENTAL
18 SERVICES, INC., et al.,
19 Defendants.

20 **CASE NO.:** CV-11-756-JW
21 **STIPULATION AND [PROPOSED] ORDER**
22 **TO CONTINUE THE PARTIES' EXPERT**
23 **DISCLOSURE DEADLINES BY 30 DAYS**
24 Motion To Be Decided on Papers
25 **DEPT:** Courtroom 9, 19th Floor
26 **JUDGE:** Hon. James Ware
27 **ACTION FILED:** February 18, 2011
28 **TRIAL DATE:** None

IT IS HEREBY STIPULATED AND AGREED by and among all parties that:

The parties' deadline to serve and lodge expert witness reports, and all related expert disclosures per Federal Rule of Civil Procedure 26, shall be continued by 30 days.

A continuance is required because Defendant has represented that a key witness, Scott Brunn, is currently unavailable and on medical leave. Plaintiff believes Mr. Brunn's testimony is necessary to properly and adequately prepare expert witnesses. Additionally, on July 16, 2012, Defendants produced over 3,000 additional documents. The parties believe review of these previously undisclosed documents is necessary to properly and adequately prepare expert witnesses.

///
///

Bracamontes & Vlasak
A Professional Law Corporation
www.bvlawsf.com

1 IT IS SO STIPULATED AND AGREED.

2
3 DATED: _____

Michael R. Bracamontes, Esq.
Bracamontes & Vlasak, P.C.
Attorneys for Plaintiff

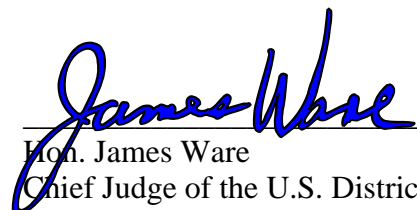
4
5
6
7 DATED: _____

Jamerson C. Allen, Esq.
Jackson Lewis, LLP
Attorney for Defendant

8
9
10
11
12 IT IS SO ORDERED that:

- 13 1. The parties shall serve and lodge expert witness reports by September 10, 2012.
- 14 2. The parties' deadline to file a Motion to Exclude Expert Witnesses shall be September 13, 2012.
- 15 3. The parties' deadline to disclose rebuttal expert witnesses shall be September 24, 2012.
- 16 4. The parties' deadline to file a Motion to Exclude Rebuttal Expert Witnesses shall be September
- 17 27, 2012.
- 18 5. The last day for a hearing on a party's Motion to Exclude an Expert Witness shall be October
- 19 17, 2012.
- 20 6. The last day for a hearing on a party's Motion to Exclude a Rebuttal Expert Witness shall be
- 21 November 1, 2012.

22
23
24 Dated: July 20, 2012



Hon. James Ware
Chief Judge of the U.S. District Court