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7  
 8 UNITED STATES DISTRICT COURT  
 9 NORTHERN DISTRICT OF CALIFORNIA  
 10 SAN FRANCISCO DIVISION

11  
 12 CHI NGUYEN,

13 Plaintiff,

14 vs.

15 CLEAN HARBORS ENVIRONMENTAL

16 SERVICES, INC., *et al.*,

17 Defendants.

**CASE NO.:** 3-11-CV-00756-MMC

**STIPULATION AND [PROPOSED] ORDER  
 TO CONTINUE DISCOVERY AND MOTION  
 DEADLINES BY 30 DAYS; ORDER THEREON**

Motion To Be Decided on Papers

**DEPT:** Courtroom 7, 19th Floor  
**JUDGE:** Hon. Maxine M. Chesney

**ACTION FILED:** February 18, 2011  
**TRIAL DATE:** None

18  
 19 IT IS HEREBY STIPULATED AND AGREED by and among all parties that:

20 All deadlines related to motions, discovery, and expert witness reports shall be vacated and  
 21 continued by 30 days.

22 A continuance of all deadlines is required because the second day of Plaintiff's deposition, the  
 23 second day of Defendant's Human Resources Director's deposition, and the initial deposition of an  
 24 important third-party witness, is not yet complete. Additionally, Plaintiff's counsel was contacted this  
 25 morning by Plaintiff's retained human resources expert and was informed that she is working from her  
 26 London office but is having Internet connectivity problems, cannot get a technician out for two days,  
 27 and has misplaced two deposition transcripts that she intended to review prior to drafting her report.

28 Further, one of the percipient witnesses was out of state and in the process of moving, and it has

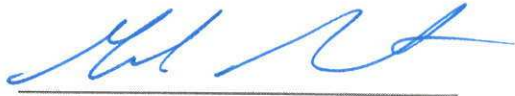
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1 been difficult to schedule his deposition.

2 Additionally, there is another percipient witness who has been on extended medical leave and his  
3 deposition may require multiple sessions in order to complete in light of his medical condition.

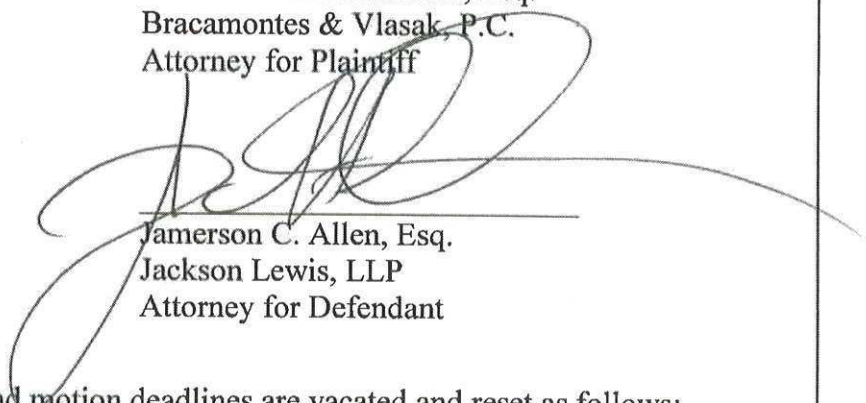
4  
5 IT IS SO STIPULATED AND AGREED.

6  
7 DATED: 9/12/12



8 Michael R. Bracamontes, Esq.  
9 Bracamontes & Vlasak, P.C.  
10 Attorney for Plaintiff

11 DATED: 9/12/2012



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

15 IT IS SO ORDERED that all discovery and motion deadlines are vacated and reset as follows:

- 16 1. The parties shall serve and lodge expert witness reports by October 10, 2012.
- 17 2. The parties' deadline to file a Motion to Exclude Expert Witnesses shall be October 15, 2012.
- 18 3. The parties' deadline to disclose rebuttal expert witnesses shall be October 24, 2012.
- 19 4. The parties' deadline to file a Motion to Exclude Rebuttal Expert Witnesses shall be October  
20 29, 2012.
- 21 5. The last day for a hearing on a party's Motion to Exclude an Expert Witness shall be November  
22 16, 2012.
- 23 6. The last day for a hearing on a party's Motion to Exclude a Rebuttal Expert Witness shall be  
24 ~~December 3, 2012.~~ December 7, 2012.
- 25 7. The close of all fact discovery shall be November 13, 2012.
- 26 8. The last day for hearing dispositive motions is ~~January 9, 2013.~~ January 11, 2013.

27 Dated: September 19, 2012

  
28 Judge of the U.S. District Court