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8 Attorneys for Defendant  
 9 CLEAN HARBORS ENVIRONMENTAL SERVICES, INC.

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

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

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

22 All deadlines related to disclosure of rebuttal expert witnesses and reports and motions related  
 23 thereto shall be vacated and continued by 30 days.

24 A continuance of said deadlines is necessary because the second day of Plaintiff's deposition, the  
 25 second day of Defendant's Human Resources Director's deposition are not yet complete. Additionally,  
 26 Defendant's retained human resources expert was called out of town, and has requested additional time  
 27 to review Plaintiff's expert's 68-page report and provide a comprehensive response.

1 IT IS SO STIPULATED AND AGREED.

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3 DATED: October 23, 2012

4 /s/  
5 Michael R. Bracamontes, Esq.  
6 Bracamontes & Vlasak, P.C.  
7 Attorney for Plaintiff

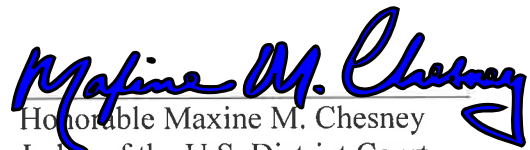
8  
9 DATED: October 23, 2012

10 /s/  
11 Cortney L. McDevitt, Esq.  
12 Jackson Lewis, LLP  
13 Attorney for Defendant

14 IT IS SO ORDERED that the deadlines concerning rebuttal experts only are vacated and reset as follows:

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1. The parties' deadline to disclose rebuttal expert witnesses shall be November 26, 2012.
  2. The parties' deadline to file a Motion to Exclude Rebuttal Expert Witnesses shall be November 30, 2012.
  3. The last day for a hearing on a party's Motion to Exclude a Rebuttal Expert Witness shall be ~~January 3, 2013.~~ January 4, 2013.

Dated: October 26, 2012

  
Honorable Maxine M. Chesney  
Judge of the U.S. District Court

4823-4853-8385, v. 1