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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

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 the continued depositions of Chi Nguyen, Linda Garcia, and Scott Weber,  
 23 as well as disclosure of rebuttal expert witnesses and reports related thereto shall be vacated and  
 24 continued until January 31, 2012; and that motions related to rebuttal expert witnesses shall be vacated  
 25 and continued accordingly.

26 A continuance of said deadlines is necessary because the parties have agreed to mediate before  
 27 Vivien Williamson on December 13, 2012, and wish to abate these discovery costs in anticipation of  
 28 mediation, while reserving their rights to engage in the discovery as necessary for preparation for trial if

- 1 -

1 mediation is unsuccessful.

2  
3 IT IS SO STIPULATED AND AGREED.

4  
5 DATED: November 20, 2012

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

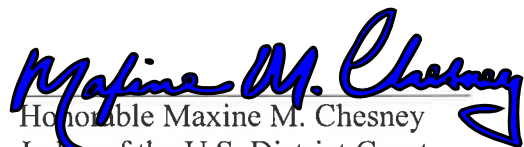
10 DATED: November 20, 2012

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

15 IT IS SO ORDERED that the deadlines concerning the continued depositions of Chi Nguyen, Linda  
16 Garcia, and Scott Weber, as well as for disclosure of rebuttal experts, are vacated and reset as follows:

- 17 1. The parties' deadline to complete the depositions of Chi Nguyen, Linda Garcia, and Scott  
18 Weber shall be January 31, 2013.
- 19 2. The parties' deadline to disclose rebuttal expert witnesses shall be January 31, 2013.
- 20 3. The parties' deadline to file a Motion to Exclude Rebuttal Expert Witnesses shall be February 5,  
21 2013.
- 22 4. The last day for a hearing on a party's Motion to Exclude a Rebuttal Expert Witness shall be  
23 March 7, 2013.
- 24 5. All other dates and deadlines shall remain unchanged.

25 Dated: November 26, 2012

26   
27 Honorable Maxine M. Chesney  
28 Judge of the U.S. District Court