1	SEYFARTH SHAW LLP	
2	Michael J. Burns (SBN 172614) E-mail: mburns@seyfarth.com	
3	Michael T. McKeeman (SBN 173662) E-mail: mmckeeman@seyfarth.com	
4	Joseph J. Orzano (SBN 262040) E-mail: jorzano@seyfarth.com	
5	560 Mission Street, Suite 3100 San Francisco, California 94105	
6	Telephone: (415) 397-2823 Facsimile: (415) 397-8549	
7	Attorneys for Big O Tires, LLC	
8	LAGARIAS & BOULTER LLP Peter C. Lagarias (SBN 77091)	
9	E-mail: pcl@lb-attorneys.com Robert S. Boulter (SBN 153549)	
10	E-mail: rsb@lb-attorneys.com	
11	San Rafael, California 94901-1828 Telephone: (415) 460-0100 Facsimile: (415) 460-1099	
12	Attorneys for Sonoma Tires, Inc. and	
13	John G. Rhiel, IV	
14	UNITED STATES DISTRICT COURT	
15	NORTHERN DISTRICT OF CALIFORNIA	
16	SAN FRANCISCO DIVISION	
17	SONOMA TIRES, INC., a California) Case No. C 11-0818 RS
18	Corporation,)) STIPULATION REGARDING
19	Plaintiff,) LITIGATION DEADLINES AND (PROPOSED) ORDER
20	v.)) [L.R. 7-12]
21	BIG O TIRES, LLC, a Colorado Limited Liability Company,	
22	Defendant.	
23)
24		
25	Big O Tires, LLC ("Big O"), on the one hand, and Sonoma Tires, Inc. ("Sonoma") and	
26	John G. Rhiel, IV ("Rhiel"), on the other hand, (collectively, "Parties") by and through their	
27	respective undersigned counsel, hereby stipulate and jointly request that the Court issue an Order	
28	as follows:	1
		tigation Deadlines and [Proposed] Order; se No. C11-0818RS

1	WHEREAS, the current non-expert discovery cut-off is June 1, 2012;		
2	WHEREAS, the parties desire to conduct depositions prior to the non-expert discovery		
3	cut-off;		
4	WHEREAS, the parties have met and conferred as to the scheduling of depositions and		
5	counsel for Sonoma Tires and Rhiel has represented that he is scheduled to commence a jury tria		
6	on May 29, 2012, is preparing for trial, and expects the jury trial to require thirty days;		
7	WHEREAS, the parties have met and conferred with respect to written discovery in this		
8	matter and Big O intends to produce additional documents to Sonoma and Rhiel;		
9	WHEREAS, the current scheduling order allows for significant time between the non-		
10	expert discovery cut-off and trial and the parties desire to use some of that time to allow for the		
11	further production of documents and to allow for the most productive conduct of depositions in		
12	an attempt to narrow the dispute, without extending the trial date;		
13	IT IS THEREFORE STIPULATED AND JOINTLY REQUESTED that:		
14	1. The Court order the time to complete party depositions without document		
15	requests and non-expert non-party depositions with or without document requests,		
16	be extended from June 1, 2012 to July 16, 2012;		
17	2. The Court order that the deadline to have heard all pretrial motions, including but		
18	not limited to any motion for summary judgment, be extended from September		
19	13, 2012 to and including September 27, 2012; and		
20	3. All other deadlines remain as set forth the Court's scheduling order.		
21	IT IS SO STIPULATED.		
22 .	SEYFARTH SHAW LLP		
23	Dated: May 11, 2012 By /s/ Joseph J. Orzano		
24	Joseph J. Orzano Attorneys for Big O Tires, LLC		
25	LAGARIAS & BOULTER, LLP		
26	Dated: May 11, 2012 By /s/ Peter C. Lagarias		
27	Peter C. Lagarias Attorneys for Sonoma Tires, Inc. and		
28	John G. Rhiel, IV		
٠	Stimulation Regarding Litigation Deadlines and Proposed Order:		

Case No. C11-0818RS

[PROPOSED] ORDER PURSUANT TO STIPULATION, IT IS SO ORDERED, The parties shall have up to and including July 16, 2012 to complete party depositions 1. without document requests and non-expert non-party depositions with or without document requests. All pretrial motions shall be heard no later than September 27, 2012. All other deadlines remain as set forth in the Court's scheduling order. 3. Dated: 5/14/12 14459269v.1