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 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)	
22 Liability Company,)	
)	
23 Defendant.)	
)	
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 WHEREAS, the parties current deadline to complete non-expert depositions is July 16,
2 2012;

3 WHEREAS, the parties have completed some but not all non-expert depositions in this
4 matter;

5 WHEREAS, the parties have met and conferred and, due to scheduling issues, desire to
6 complete all discovery, including depositions, by on or before August 3, 2012;

7 WHEREAS, the current scheduling order, as modified by the Court's May 4, 2012 Order,
8 provides adequate time to allow for the requested modification without extending the trial date;

9 **IT IS THEREFORE STIPULATED AND JOINTLY REQUESTED** that:

- 10 1. The Court order that the parties shall have up to and including August 3, 2012 to
11 complete non-expert discovery, including non-expert depositions;
- 12 2. The Court order that the parties shall have up to and including October 11, 2012
13 to have heard all pretrial motions, including but not limited to any motion for
14 summary judgment and/or summary adjudication; and
- 15 3. All other deadlines remain as set forth the Court's scheduling order.

16 **IT IS SO STIPULATED.**

17 SEYFARTH SHAW LLP

18 Dated: July 13, 2012

By /s/ Joseph J. Orzano
Joseph J. Orzano
Attorneys for Big O Tires, LLC

19 LAGARIAS & BOULTER, LLP

20 Dated: July 13, 2012

By /s/ Peter C. Lagarias
Peter C. Lagarias
Attorneys for Sonoma Tires, Inc. and
John G. Rhiel, IV

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[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED,

1. The parties shall have up to and including August 3, 2012 to complete non-expert discovery, including non-expert depositions;
2. All pretrial motions shall be heard no later than October 11, 2012; and
3. All other deadlines remain as set forth in the Court's scheduling order.

Dated: 7/13/12


The Honorable Richard Soborg

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