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8 Attorneys for Plaintiff
9 TERESA VIERA

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA

12 TERESA VIERA,
13 Plaintiff,

14 Case No. C11-01794 ICS

15 STIPULATION AND ORDER
16 REGARDING MODIFICATION OF
17 FURTHER CASE MANAGEMENT AND
18 PRE-TRIAL ORDER

19 MASTERCORP, INC., AND DOE ONE
20 THROUGH DOE FIFTY, inclusive,

21 Defendants.

22 STIPULATION

23 IT IS HEREBY STIPULATED BETWEEN PLAINTIFF TERESA VIERA AND
24 DEFENDANT MASTERCORP, INC., AS FOLLOWS:

25 WHEREAS, the parties have jointly agreed to participate in the Court's Early Neutral
26 Evaluation (ENE) process and the Court has referred this matter to ENE and Jane Pandell, Esq., has
27 been appointed the ENE Evaluator:

28 WHEREAS, the parties have determined to complete certain discovery to make the ENE
29 process most efficient;

30 WHEREAS, in light of the volume of work to be completed, the calendars of plaintiff and

31 STIPULATION AND ORDER REGARDING MODIFICATION OF FURTHER CASE MANAGEMENT AND
32 PRE-TRIAL ORDER (CASE NO. C11-01794 ICS)

1 defense counsel and the ENE evaluator, the parties require to the end of November 2011 to
2 complete the agreed upon discovery and to schedule an ENE hearing date that is workable for the
3 parties, Ms. Pandell, and counsel;

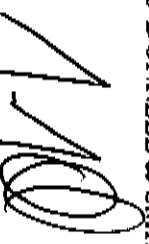
4 WHEREAS the Court previously ordered that (1) the ENE process be completed by October
5 14, 2011, and (2) the parties participate in a further Case Management Conference on October 21,
6 2011;

7 WHEREAS the parties believe it to be in the best interests of their clients, Ms. Pandell and
8 the Court to modify these dates and hereby stipulate to and request that the parties shall have to and
9 including November 30, 2011, to complete the ENE process, and that a further Case Management
10 Conference be set on the first date in December, 2011, convenient to the Court's schedule.

11 IT IS SO AGREED.

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13 Dated: August 11, 2011

O'DONNELL & SMITH

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16 BY:  JAMES J. O'DONNELL, ESQ.
17 Attorney for Plaintiff
18 TERESA VIERA

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27 STIPULATION AND ORDER REGARDING MODIFICATION OF FURTHER CASE MANAGEMENT AND
PRE-TRIAL ORDER (CASE NO. C 11-01794 JCS)

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2
3 Dated: August 11, 2011

NARAYAN & HUDSON


BY: WILLIAM FITZGERALD, ESQ.

Attorney for Defendant
MASTERCORP, INC.

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PRE-TRIAL ORDER (CASE NO. C 11-01794 JCS)
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ORDER

6 **BASED ON THE FOREGOING AND GOOD CAUSE OTHERWISE APPEARING, the**
7 **Court orders that the parties shall have to and including November 30, 2011, to complete the ENE**
8 **process, and that a further Case Management Conference shall be set for December 2, 2011, at**
9 **1:30 p.m. Updated case mgmt conference statement shall be due by 11/30/11.**

10 **IT IS SO ORDERED.**

11
12 Dated: 08/12, 2011

By

