

1 MICHAEL D. ROUNDS (CA Bar #133972)
 2 ADAM K. YOWELL (CA Bar #273661)
 3 WATSON ROUNDS
 4 One Embarcadero Center
 5 Suite 4100
 6 San Francisco, California 94111
 7 Phone: 415-243-4090
 8 Facsimile: 415-243-0226
 9 Email: mrounds@watsonrounds.com
 10 Email: ayowell@watsonrounds.com

11 Attorneys for Plaintiffs
 12 DOUGLAS CLIFFORD, STUART COOK, and PATRICIA FOGERTY

13 ROBERT S. BESSER, State Bar No. 46541
 14 CHRISTOPHER CHAPIN, State Bar No. 112608
 15 LAW OFFICES OF ROBERT S. BESSER
 16 1221 Second Street Suite 300
 17 Santa Monica, California 90401
 18 TEL: (310) 394-6611
 19 FAX: (310) 394-6613
 20 rsbesser@aol.com
 21 christopherchapin@aol.com

22 Attorneys for Defendant
 23 CONCORD MUSIC GROUP, INC.

24 **UNITED STATES DISTRICT COURT**
 25 **NORTHERN DISTRICT OF CALIFORNIA**

26 DOUGLAS CLIFFORD, STUART COOK,
 27 and PATRICIA FOGERTY,

28 Plaintiffs,

-vs-

CONCORD MUSIC GROUP, INC. a Delaware
 corporation,

Defendant.

Case No. 3:11-cv-02519-EMC

STIPULATED REQUEST FOR
ORDER EXTENDING DISCOVERY
DEADLINES ; ORDER

IT IS HEREBY stipulated by and between Plaintiffs, DOUGLAS CLIFFORD, STUART
 COOK, and PATRICIA FOGERTY, and Defendant, CONCORD MUSIC GROUP, INC., by and
 between their attorneys of records and pursuant to L.R. 6-2, that the dates set for the close of

STIPULATED REQUEST FOR ORDER
 EXTENDING DISCOVERY DEADLINES
 CASE NO. 3:11-CV-2519-EMC

1 discovery as set forth in the Case Management and Pretrial Order for Jury Trial (Doc. #39) be
2 extended twenty-one days as follows:

- 3 4. DISPOSITIVE MOTIONS: ~~2/2/13~~ 2/1/13 at 1:30 p.m.
4 5. NON-EXPERT DISCOVERY CUT-OFF: 11/ 9/12
5 6. EXPERT REPORTS: Opening reports by 11/9/12
6 Rebuttal reports by 11/30/12
7
8 7. EXPERT DISCOVERY CUT-OFF: 12/ 21/12

9
10 This is the first request by the parties to extend these deadlines made so that the
11 scheduling of party witnesses for depositions may be accommodated. This request will not affect
12 the other dates of the Case Management and Pretrial Order for Jury Trial (Doc. # 39) or the trial
13 of this matter set to commence on April 1, 2013.
14

15
16 Respectfully submitted,

17 Dated: September 25, 2012

18 WATSON ROUNDS

19 By: /s/ Michael Rounds
20 MICHAEL ROUNDS
21 Attorneys for Plaintiffs DOUGLAS CLIFFORD,
22 STUART COOK and PATRICIA FOGERTY

23 Dated: September 25, 2012

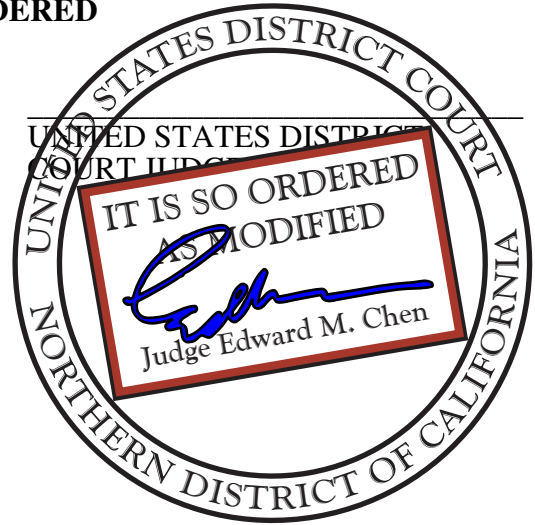
24 LAW OFFICES OF ROBERT S. BESSER

25 By: /s/ Robert S. Besser
26 ROBERT S. BESSER
27 Attorneys for Plaintiffs CONCORD MUSIC GROUP, INC.
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

PURSUANT TO STIPUATION, IT IS SO ORDERED

Dated: September 28, 2012



1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

The undersigned certifies that, on this date, she/he caused this document to be electronically filed with the Clerk of Court using the CM/ECF system, which will send notification of filing to counsel of record for each party.

Dated: September 25, 2012 /s/ Jeff Tillison
An Employee of Watson Rounds