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17 Attorneys for defendant Office Depot, Inc.

18 IN THE UNITED STATES DISTRICT COURT
19 FOR THE NORTHERN DISTRICT OF CALIFORNIA

20 DAVID REDMOND, an individual,

21 Plaintiff,

22 vs.

23 OFFICE DEPOT, INC., a corporation, and
24 DOES One through 200,

25 Defendants.

Case No.: C-11-03314 RS

**STIPULATION AND [PROPOSED]
ORDER TO VACATE AND
RESCHEDULE EXPERT WITNESS
DISCOVERY DEADLINES**

1 Pursuant to Local Rule 7-12, in the matter of *David Redmond v. Office Depot, Inc.*, Case
2 No. C 11-03314-RS, counsel for Plaintiff David Redmond and counsel for defendant Office
3 Depot, Inc., ("Office Depot") jointly submit the following Stipulation agreeing to vacate and
4 reschedule the current deadlines for completing expert witness discovery.

5 WHEREAS, a trial date has not been set in this matter;

6 WHEREAS, at the Initial Case Management Conference on October 20, 2011, the Court
7 indicated that a trial date would be scheduled at the next Case Management Conference, set for
8 June 7, 2012, with the date of trial scheduled in approximately March 2013, at the earliest;

9 WHEREAS, the plaintiff and defendant agree that extending the deadlines for
10 disclosure and discovery of expert witness opinions to dates closer to the anticipated pretrial
11 conference and trial date, and after dispositive motions, is in the best interest of all parties and
12 will not cause any delay in the prosecution of this action;

13 THEREFORE, the parties hereby stipulate and agree:

14 1. The Expert Witness deadlines set forth in the Case Management Scheduling
15 Order, dated 10/21/11, are vacated.

16 2. The disclosure and discovery of expert witness opinions shall proceed as follows:

17 A. On or before October 12, 2012, plaintiff shall disclose expert testimony
18 and reports in accordance with Federal Rule of Civil Procedure 26(a)(2).

19 B. On or before November 9, 2012, defendant shall disclose expert testimony
20 and reports in accordance with Federal Rule of Civil Procedure 26(a)(2).

21 C. On or before November 30, 2012, all discovery of expert witnesses
22 pursuant to Federal Rule of Civil Procedure 26(b)(4) shall be completed.

23 Date: 1/19/12

/s/ Hallie Von Rock

24 _____
Hallie Von Rock
25 Attorney for Plaintiff David Redmond

26 Date: 1/19/12

/s/ Michael E. Brewer

27 _____
Michael E. Brewer
28 Attorney for Defendant Office Depot, Inc.

