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17 UNITED STATES DISTRICT COURT
 18 NORTHERN DISTRICT OF CALIFORNIA

20 **HENRY M. BURGOYNE, III,**
 21 Plaintiff,
 22 v.
 23 **KARL S. KRONENBERGER,** an
 individual; **KRONENBERGER**
 24 **ROSENFELD LLP,** a California limited
 liability partnership; and **DOES 1 through 10,**
 25 inclusive,
 26 Defendants.

CASE NO. 3:11-cv-06376-EDL

**STIPULATION TO EXTEND DEADLINES
 AND ~~PROPOSED~~ ORDER FOR:
 AMENDED PLEADINGS, JOINDER OF
 PARTIES, DISCOVERY CUT-OFF,
 EXPERT DISCLOSURES, EXPERT
 DISCOVERY, DISPOSITIVE MOTIONS,
 PRE-TRIAL CONFERENCE, AND TRIAL
 DATE
 AS MODIFIED**

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1 Pursuant to an agreement set forth at the June 19, 2012 mediation, and in an effort to
2 continue good faith efforts toward informal resolution, the parties hereby agree to continue the
3 deadlines set forth for Amended Pleadings, Joinder of Parties, Discovery and Motions as
4 follows: (1) Amended Pleadings Deadline, currently set for July 15, 2012, will be extended to
5 September 13, 2012; (2) Joinder of Parties Deadline, currently set for July 15, 2012, will be
6 extended to September 13, 2012; (3) the Discovery Deadline, currently set for October 26, 2012,
7 will be extended to January 11, 2013; (4) Initial Expert Disclosures, currently set for November
8 9, 2012, will be extended to January 8, 2013; (5) Rebuttal Expert Disclosures, currently set for
9 November 30, 2012, will be extended to January 29, 2013; (6) the Expert Discovery Deadline,
10 currently set for December 21, 2012, will be extended to February 19, 2013; (7) Dispositive
11 Motions Deadline, currently set for January 22, 2013, will be extended to March 19, 2013; (8)
12 the Pre-Trial Conference, currently set for May 7, 2013 at 2:00 p.m., will be extended to June 25,
13 2013, ~~at a time to be set by the Court,~~ and (9) the Jury Trial, currently set for May 28, 2013, will
14 be extended to July 15, 2013.

15 The parties respectfully request the Court enter an order that current deadlines listed
16 above be extended as agreed to by the parties.

17 WHEREAS, Plaintiff and Defendants agreed to the above scheduling changes during
18 mediation on June 19, 2012;

19 THEREFORE, IT IS HEREBY STIPULATED by and between Plaintiff and Defendants
20 through their designated counsel that the above scheduling changes be granted and entered by the
21 Court.

22 IT IS SO STIPULATED.


23 Dated: July 02, 2012

THE LAW OFFICES OF RORY C. QUINTANA

24
25 By: s/Rory C. Quintana
26 Rory C. Quintana
27 *Attorney for Plaintiff Henry M. Burgoyne, III*

1 Dated: ~~June 29~~, 2012

ANDERIES & GOMES LLP

By: 
Shane K. Anderies

Attorney for Defendants Karl M. Kronenberger
and Kronenberger Rosenfeld LLP

6 The Court having considered the stipulation of the parties, and good cause appearing
7 therefore, orders as follows:

- 8 1. The proposed deadlines as described above shall be granted.

9 IT IS SO ORDERED. The Pretrial Conference is set for 2:00 p.m. on June 25, 2013.

11 Dated: July 3, 2012


UNITED STATES MAGISTRATE JUDGE
NORTHERN DISTRICT OF CALIFORNIA

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CERTIFICATE OF SERVICE

I, Rory C. Quintana, hereby certify that on July 02, 2012, I authorized and served by electronic means on the parties listed below, as follows:

**STIPULATION TO EXTEND DEADLINES AND [PROPOSED] ORDER FOR:
AMENDED PLEADINGS, JOINDER OF PARTIES, DISCOVERY CUT-OFF, EXPERT
DISCLOSURES, EXPERT DISCOVERY, DISPOSITIVE MOTIONS, PRE-TRIAL
CONFERENCE, AND TRIAL DATE**

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I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on July 02, 2012.

By: s/Rory C. Quintana
Rory C. Quintana
Attorney for Plaintiff Henry M. Burgoyne, III