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9	Attorneys for Plaintiff Henry M. Burgoyne, III	
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15 16	Attorneys for Defendants Karl Kronenberger a Kronenberger Rosenfeld LLP	nd
17	UNITED STATES	S DISTRICT COURT
18	NORTHERN DISTR	RICT OF CALIFORNIA
19		
20	HENRY M. BURGOYNE, III	CASE NO. 3:11-cv-06376 EDL
21	Plaintiff,	STIPULATION TO EXTEND DEADLINES AND AMENDED ORDER FOR: AMENDED
22	v.	PLEADINGS, JOINDER OF PARTIES, DISCOVERY CUT-OFF, EXPERT
23	KARL S. KRONENBERGER, an individual; KRONENBERGER ROSENFELD LLP, a	DISCLOSURES, EXPERT DISCOVERY, DISPOSITIVE MOTIONS, PRE-TRIAL
24	California limited liability partnership; and DOES 1 through 10, inclusive,	CONFERENCE, AND TRIAL DATE
25	Defendants.	
26		
27		
28	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, AND DISPOSITIVE MOTIONS

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 further		
3	continue the deadlines set forth for Amended Pleadings, Joinder of Parties, Discovery, Motions,		
4	and Trial as follows: (1) Amended Pleadings Deadline, currently set for July 15, 2012, will be		
5	extended to October 15, 2012; (2) Joinder of Parties Deadline, currently set for July 15, 2012,		
6	will be extended to October 15, 2012; (3) the Discovery Deadline, currently set for October 26,		
7	2012, will be extended to February 11, 2013; (4) Initial Expert Disclosures, currently set for		
8	November 9, 2012, will be extended to February 8, 2013; (5) Rebuttal Expert Disclosures,		
9	currently set for November 30, 2012, will be extended to March 2, 2013; (6) the Expert		
10	Discovery Deadline, currently set for December 21, 2012, will be extended to March 21, 2013;		
	(7) Dispositive Motions filing Deadline, currently set for January 22, 2013, will be extended to		
11	April 18, 2013; (8) the Pre-Trial Conference, currently set for May 7, 2013 at 2:00 p.m., will be		
12	extended to July 22, 2013, at a time to be set by the Court; and (9) the Jury Trial, currently set for		
13	May 28, 2013, will be extended to August 12, 2013.		
14	The parties respectfully request the Court enter an order that current deadlines listed		
15	above be extended as agreed to by the parties.		
16	WHEREAS, Plaintiff and Defendants agreed to the above scheduling changes during		
17	mediation on June 19, 2012;		
18	THEREFORE, IT IS HEREBY STIPULATED by and between Plaintiff and Defendants		
19	through their designated counsel that the above scheduling changes be granted and entered by the		
20	Court.		
21	IT IS SO STIPULATED.		
22			
23	Dated: July 30, 2012 THE LAW OFFICES OF RORY C. QUINTANA		
24			
25	By:s/Rory C. Quintana		
26	Rory C. Quintana Attorney for Plaintiff Henry M. Burgoyne, III		
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3	Dated: July 30, 2012	ANDERIES & GOMES LLP	
4		By:	
5		Shane K. Anderies	
6		Attorney for Defendants Karl M. Kronenberger and Kronenberger Rosenfeld LLP	
7	Files? A44-44* Demonstrate Committee of		
8	Filer's Attestation : Pursuant to General Order No. 45 §X(B), I attest under penalty of		
9	perjury that concurrence in the filing of the do	ocument has been obtained from its signatory.	
10	Datada July 20, 2012	Respectfully submitted,	
11	Dated: July 30, 2012		
12			
13		By: s/Rory C. Quintana Rory C. Quintana	
14		Attorney for Plaintiff Henry M. Burgoyne, III	
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1	The Court having considered the stipulation of the parties, and good cause appearing
2	therefore, orders as follows:
3	1. The proposed deadlines as described above shall be granted. The Pretrial
4	Conference is set for Tuesday, July 23, 2013, at 2:00 p.m.
5	IT IS SO ORDERED.
6	IT IS SO ORDERED. Dated: August 1, 2012
7	Dated: August 1, 2012
8	UNITED STATES OF THE AS MODIFIED AS MODIFIED
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11	Judge Elizabeth D. Laporte
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13	THE VOISTRICT OF CE
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1	CERTIFICATE OF SERVICE			
2	I, Rory C. Quintana, hereby certify that on July 30, 2012, I authorized and served by			
3	electronic means on the parties listed below, as follows:			
4	ANDERIES & GOMES LLP			
5	Shane K. Andereies (SBN 215415) Allan J. Gomes (SBN 225810)			
6	S. Christine Young (SBN 253964) 601 Montgomery Street, Suite 888 San Francisco, California 94111			
7	Telephone: (415) 217-8802			
8	Facsimile: (415) 217-8803			
9	I certify under penalty of perjury under the laws of the United States of America that the			
10	foregoing is true and correct. Executed on July 30, 2012.			
11				
12	By: s/Rory C. Quintana			
13	Rory C. Quintana Attorney for Plaintiff Henry M. Burgoyne, III			
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