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5 Attorneys for Defendant
 6 MASAI USA CORP.
 (Erroneously sued herein as
 7 MASAI USA CORPORATION)

8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA
 10
 11 SAN FRANCISCO DIVISION

12 MAVOURNEEN BROWN,
 13 Plaintiff,

14 v.

15 MASAI USA CORPORATION, a
 corporation; and DOES 1 through 100,
 16 inclusive,
 17 Defendants.

) Case No. 3:12-CV-00324-MEJ
) AMENDED
) **STIPULATED REQUEST FOR ORDER**
) **ENLARGING TIME IN CASE**
) **MANAGEMENT ORDER AND**
) **[PROPOSED] ORDER**

) Complaint Filed: January 20, 2012
) Trial Date: 09/09/13

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 20 Pursuant to Northern District of California Local Rule 6-2 defendant MASAI USA
 21 CORP., by and through its counsel of record and plaintiff MAVOURNEEN BROWN, plaintiff
 22 *in pro per*, respectfully request an Order enlarging time in the August 13, 2012 Case
 23 Management Order and make the following stipulation:

- 24 1. Plaintiff MAVOURNEEN BROWN filed her Complaint on January 20, 2012;
- 25 2. Defendant MASAI USA CORP. filed its Answer on April 14, 2012;
- 26 3. Plaintiff MAVOURNEEN BROWN was unable to participate in the litigation for
 27 a period of time because she was recovering from an April 2012 ankle surgery;
- 28 4. From approximately October 2009 to the present plaintiff MAVOURNEEN

1 BROWN has had continued and ongoing difficulties with her ankle and been intermittently
2 unable to participate in this litigation;

3 5. From approximately December 29, 2012 through mid-January 2013 plaintiff
4 MAVOURNEEN BROWN was very ill with the flu and unable to participate in the litigation;

5 6. Accordingly, the parties rescheduled mediation from January 11, 2013 to January
6 29, 2013;

7 7. The new mediation date is shortly before the parties' deadline to disclose expert
8 witnesses;

9 8. In order to allow the parties to participate in mediation and adequately prepare for
10 trial, the parties request at least a 30-day continuation of the following dates/deadlines set forth
11 in the August 13, 2012 Case Management Order:

12 a. Disclosure of Expert Witnesses: continued from 2/8/2013 to 3/8/2013;

13 b. Disclosure of Rebuttal Expert Witnesses: continued from 2/15/2013 to
14 3/15/2013;

15 c. Dispositive Pretrial Motions:

16 i. All dispositive motions shall be filed, served and noticed by
17 5/6/2013 (continued from 4/04/2013);

18 ii. All dispositive motions shall be heard on 6/10/2013 (continued
19 from 5/09/2013);

20 d. Completion of Discovery: continued from 3/05/2013 to 4/5/2013.

21 9. The continuation of the above dates will not affect the September 9, 2013 trial
22 date in this matter or dates and deadlines related to trial.

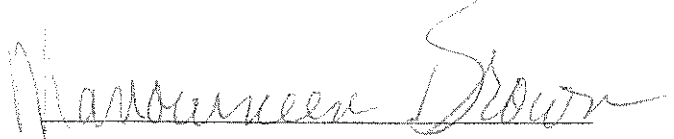
23 10. The parties were previously granted a continuance of the initial case management
24 conference (continued from May 3, 2012 to August 23, 2012) because plaintiff was recovering
25 from a recent ankle surgery and unable to participate in the scheduled conference or related dates
26 and deadlines.

27 11. The parties were previously granted a continuance of the deadline to complete
28 mediation (from November 11, 2012 to January 31, 2012) to allow the parties to meaningfully

1 participate in mediation after plaintiff was unable to participate in the litigation for a period of
2 time preventing the parties from completing the necessary discovery in advance of mediation.

3 **IT IS SO STIPULATED.**

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5 Dated: January 18, 2013



6 Mavourneen Brown
7 Pro Se Plaintiff

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9 Dated: January 18, 2013

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By _____
Renée Welze Livingston
Crystal L. Van Der Putten
Attorneys for Defendant
MASAI USA CORP.
(Erroneously sued herein as
MASAI USA CORPORATION)

1 participate in mediation after plaintiff was unable to participate in the litigation for a period of
2 time preventing the parties from completing the necessary discovery in advance of mediation.

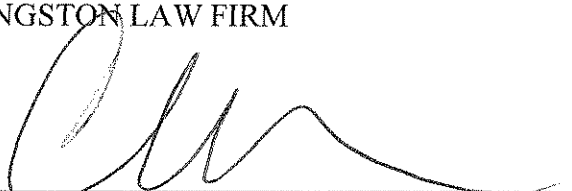
3 **IT IS SO STIPULATED.**

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5 Dated: January 21, 2013

6 Mavourneen Brown
7 Pro Se Plaintiff

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9 Dated: January 21, 2013

LIVINGSTON LAW FIRM

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11
12 By  _____

13 Renee Welze Livingston
14 Crystal L. Van Der Putten
15 Attorneys for Defendant
16 MASAI USA CORP.
17 (Erroneously sued herein as
18 MASAI USA CORPORATION)

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ORDER MODIFYING AUGUST 13, 2012 CASE MANAGEMENT ORDER

IT IS HEREBY ORDERED that the August 13, 2012 Case Management Order is modified with regard to dates as set forth below:

- Disclosure of Expert Witnesses due 3/8/2013;
- Disclosure of Rebuttal Expert Witnesses due 3/15/2013;
- Dispositive Pretrial Motions:
 - All dispositive motions shall be filed, served and noticed by 5/6/2013;
 - All dispositive motions shall be heard on ~~6/10/2013;~~ 06/13/2013
- Discovery completed by 4/5/2013.

Dated: January 23, 2013



Honorable Maria Elena James
UNITED STATES MAGISTRATE JUDGE

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Natural Person Appearing Pro Se.
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Castro Valley, CA 94552

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8 UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
9

10 MAVOURNEEN BROWN,

11 Plaintiff,

12 vs.

13 MASAI USA CORPORATION, a corporation;
14 and DOES 1 through 100,

15 Defendants.
16
17

No.: CV12 0324 MEJ

DECLARATION OF MAVOURNEEN BROWN
IN SUPPORT OF STIPULATED REQUEST
FOR ORDER ENLARGING TIME IN CASE
MANAGEMENT ORDER

Complaint Filed: January 20, 2012
Trial Date: September 9, 2013

Honorable Maria-Elena James

18 I, MAVOURNEEN BROWN, do hereby declare:

19 1. I am the plaintiff in the action entitled *Mavourneen Brown v. Masai USA Corp.*, Case
20 No. 3:12-CV-00324-MEJ. The facts stated herein are of my own personal knowledge. If called as a
21 witness, I could and would competently testify to the facts herein stated.

22 2. I was unable to participate in the litigation for a period of time in 2012 because I was
23 recovering from an April 2012 ankle surgery.

24 3. From approximately October 2012 to the present I have had continued and ongoing
25 difficulties with my ankle and been intermittently unable to participate in this litigation.

26 4. From approximately December 29, 2012 through mid-January 2013 I was very ill
27 with the flu and unable to participate in the litigation.
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5. Because of my recent illness, the parties rescheduled mediation from January 11, 2013 to January 29, 2013

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 18th day of January, 2013, at Castro Valley, California.


MAVOURNEEN BROWN