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11 DAVID R. BATTON; ANDRE DOUZDJIAN;
12 BATTON TECHNICAL ENGINEERING
13 CONSULTANTS, INC.; BATTON, INC.;
14 HANBON -- CARO I, LLC; HANBON --
15 MI I, LLC; HANBON MI II, INC.; HANBON --
16 MARLETTE, LLC; HANBON -- PA I, LLC;
17 TEC GROUP, INC.; DEPLOY HR, INC.;
18 DEPLOYHR, INC.

19 IN THE UNITED STATES DISTRICT COURT
20 FOR THE NORTHERN DISTRICT OF CALIFORNIA
21 SAN FRANCISCO DIVISION

22 CORNERSTONE STAFFING SOLUTIONS, INC.,
23 a California Corporation,

24 Plaintiff,

25 vs.

26 LARRY THAXTER JAMES an individual; DAVID
27 R. BATTON, an individual; TED MANNELLO, an
28 individual; ANDRE DOUZDJIAN, an individual;
MICHAEL SANTOS, an individual; MARCOS
BARRERA, an individual; BATTON TECHNICAL
ENGINEERING CONSULTANTS, INC., a
Michigan corporation; BATTON DIVERSIFIED
STAFFING SOLUTIONS, a Michigan corporation;
HANBON-CARO I, LLC, a Michigan limited
liability company a/k/a CARO I, LLC; HANBON --
MI I, LLC, a Michigan limited liability company
d/b/a TECHNICAL ENGINEERING
CONSULTANTS; HANBON - MI II, INC., a
Michigan corporation d/b/a BATTON TECHNICAL
ENGINEERING CONSULTANTS; HANBON --
MARLETTE, LLC, a Michigan limited liability
company; HANBON - PA I, LLC a Pennsylvania

Case No.: 3:12-cv-01527-RS

Assigned to Hon. Richard Seeborg

**STIPULATION FOR TIMING OF
EXPERT DISCLOSURES,
COMPLETION OF EXPERT
DISCOVERY, AND ~~PROPOSED~~
ORDER**

Complaint Filed: March 27, 2012

Trial Date: October 28, 2013

1 limited liability company; HANBON - CT I, LLC a
2 Connecticut limited liability company; TEC GROUP
3 INC., a Michigan corporation d/b/a TEC GROUP
4 ALSO d/b/a TEC-CHRYSLER; DEPLOY HR,
5 INC., a Pennsylvania corporation d/b/a DEPLOY
6 HR STAFFING, INC.; DEPLOYHR, INC., a
7 California corporation d/b/a TEC ALSO d/b/a
8 BATTON; and DOES 1- 100,

9 Defendants.

10 **STIPULATION**

11 The parties signing below acknowledge the following:

12 1. In the initial Joint Case Management Statement in this matter (Document #46), the
13 parties indicated that they were amenable to setting the date for expert disclosures 120 days before
14 trial.

15 2. In the Supplemental Joint Case Management Statement in this matter (Document
16 #93), the parties indicated that they were amenable to setting the date for completion of expert
17 discovery on June 28, 2013. That was an inadvertent error. June 28 is approximately 120 days
18 before trial. The parties intended to set that date for expert disclosures, not for the completion of
19 expert discovery. That date is too early to allow sufficient time for the completion of expert
20 discovery in this matter.

21 3. The parties stipulate to setting the date for expert disclosures on June 28, 2013.

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1 4. The parties stipulate to setting the date for completion of expert discovery on
2 August 23, 2013, commensurate with the completion of non-expert discovery.

3 **IT IS SO STIPULATED.**

4 MARRON LAWYERS

5 Dated: 1.22.13

6 Signed: 

7 PAUL MARRON
8 MARK POLLAND
9 Attorneys for Defendants LARRY JAMES; DAVID
10 R. BATTON; ANDRE DOUZDJIAN; BATTON
11 TECHNICAL ENGINEERING CONSULTANTS,
12 INC.; BATTON, INC.; HANBON -- CARO I, LLC;
13 HANBON -- MI I, LLC; HANBON MI II, INC.;
14 HANBON -- MARLETTE, LLC; HANBON -- PA
15 I, LLC; TEC GROUP, INC.; DEPLOY HR, INC.;
16 DEPLOYHR, INC.

17 HILL, FARRER & BURRILL LLP

18 Dated: 1/25/13

19 Signed: 

20 NEIL MARTIN
21 CLAYTON HIX
22 Attorneys for Plaintiff CORNERSTONE
23 STAFFING SOLUTIONS, INC. and Counter-
24 Defendant MARY ANDERSON

25 BURKHARDT & LARSON

26 Dated: _____

27 Signed: _____

28 PHILIP BURKHARDT
Attorneys for Defendant MARCOS BARRERA

WOODS LAW GROUP

Dated: 1/22/13

Signed: 

BRINY WOODS
Attorneys for Defendant MICHAEL SANTOS and
HANBON -- CT I, LLC

1 4. The parties stipulate to setting the date for completion of expert discovery on
2 August 23, 2013, commensurate with the completion of non-expert discovery.

3 IT IS SO STIPULATED.

4 MARRON LAWYERS

5
6 Dated: 1.22.13

Signed: 

7 PAUL MARRON
8 MARK POLLAND
9 Attorneys for Defendants LARRY JAMES; DAVID
10 R. BATTON; ANDRE DOUZDJIAN; BATTON
11 TECHNICAL ENGINEERING CONSULTANTS,
12 INC.; BATTON, INC.; HANBON -- CARO I, LLC;
13 HANBON -- MI I, LLC; HANBON MI II, INC.;
14 HANBON -- MARLETTE, LLC; HANBON -- PA
15 I, LLC; TEC GROUP, INC.; DEPLOY HR, INC.;
16 DEPLOYHR, INC.

17 HILL, FARRER & BURRILL LLP

18
19 Dated: _____

Signed: _____

20 NEIL MARTIN
21 CLAYTON HIX
22 Attorneys for Plaintiff CORNERSTONE
23 STAFFING SOLUTIONS, INC. and Counter-
24 Defendant MARY ANDERSON

25 BURKHARDT & LARSON

26
27 Dated: 1/22/13

Signed: 

28 PHILIP BURKHARDT
Attorneys for Defendant MARCOS BARRERA

WOODS LAW GROUP

Dated: _____

Signed: _____

BRINY WOODS
Attorneys for Defendant MICHAEL SANTOS and
HANBON - CT I, LLC

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~~[PROPOSED]~~ ORDER

Pursuant to the foregoing stipulation, the Court orders that:

1. The date for expert disclosures is on June 28, 2013.
2. The date for completion of expert discovery is on August 23, 2013, commensurate with the completion of non-expert discovery.

IT IS SO ORDERED.

Date: 2/6/13



The Honorable Richard Seeborg
Judge of the United States District Court