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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

CORNERSTONE STAFFING SOLUTIONS, INC., a California corporation,

Plaintiff,

vs.

LARRY THAXTER JAMES, an individual; DAVID R. BATTON, an individual; ANDRE DOUZDJIAN, an individual; MICHAEL SANTOS, an individual; MARCOS BARRERA, an individual; BATTON TECHNICAL ENGINEERING CONSULTANTS, INC., a Michigan corporation; BATTON, INC., a Michigan corporation a/k/a BATTON DIVERSIFIED STAFFING SOLUTIONS; 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 a/k/a HANBON – MARLETTE I, LLC; HANBON – PA I, LLC, a Pennsylvania limited liability company; HANBON – CT I, LLC, a Connecticut limited liability company; TEC GROUP, INC., a Michigan corporation d/b/a TEC GROUP also d/b/a

CASE NO. 3:12-CV-01527-RS

*[Assigned to the Hon. Richard Seeborg, judge presiding in Courtroom 3]*

**[PROPOSED] ORDER GRANTING STIPULATION TO CONTINUE TRIAL AND MODIFY THE JULY 20, 2013 CASE MANAGEMENT SCHEDULING ORDER**

1 TEC-CHRYSLER; DEPLOY HR )  
2 STAFFING, INC.; DEPLOYHR, INC., a )  
3 California corporation a/d/b TEC also )  
4 d/b/a BATTON; and DOES 1-100. )

Filing Date: March 27, 2012  
Trial Date: October 28, 2013

Defendants.

5 AND RELATED CROSS-ACTIONS  
6

7 Pursuant to the Stipulation by and between the Parties to the above-entitled action to  
8 continue trial and modify the July 20, 2013 Case Management Scheduling Order and for Good  
9 Cause, the Court orders as follows:

- 10 1. The Parties shall produce written expert reports pursuant to *Federal Rule of Civil*  
11 *Procedure* §26(a)(2)(B) by September 27, 2013.
- 12 2. All non-expert discovery shall be completed by November 22, 2013.
- 13 3. All expert discovery shall be completed by December 20, 2013.
- 14 4. Counsel for the Parties shall file a Joint Pre-trial Statement by January 23,  
15 9, 2014.  
30,
- 16 5. The final Pre-trial Conference shall be held on January 16, 2014.  
February 10,
- 17 6. Trial shall commence on January 27, 2014 or a date as convenient with the Court's  
18 schedule.

19 DATED: 6/21/13

  
UNITED STATES DISTRICT JUDGE