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8 Attorneys for Plaintiff/Counter-Defendant
CornerStone Staffing Solutions, Inc., and
9 Counter-Defendant Mary Anderson

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT - SAN FRANCISCO DIVISION

13 CORNERSTONE STAFFING
SOLUTIONS, INC., a California
14 corporation,

15 Plaintiff,

16 vs.

17 LARRY THAXTER JAMES, an
18 individual; et al.,

19 Defendants.

20 AND RELATED COUNTER-
21 CLAIMS.

CASE NO. 12-cv-01527-RS

[Assigned to Hon. Richard Seeborg]

**STIPULATION AND ~~PROPOSED~~
ORDER EXTENDING TIME TO
RESPOND TO MARCOS BARRERA
SUMMARY JUDGMENT MOTION**

Date: October 3, 2013
Time: 1:30 p.m.
Location: Courtroom 3

Complaint Filed: March 27, 2012
Trial Date: February 10, 2014

22 **STIPULATION**

23 WHEREAS, on August 23, 2013, Defendant Marcos Barrera (“Barrera”) filed a
24 Motion for Summary Judgment or, in the Alternative, Partial Summary Judgment [dtk. #
25 186] (the “Barrera MSJ”), in the above-entitled matter;

26 WHEREAS, the current deadline for Plaintiff Cornerstone Staffing Solutions, Inc.
27 (“Cornerstone”) to file its opposition to the Barrera MSJ is September 6, 2013, and the
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12-CV-01527-RS

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1 current deadline for Barrera to file a reply brief is September 13, 2013;

2 WHEREAS, CornerStone's consultant has been unable to access the disk drive
3 images provided by Barrera, the review of which is critical to CornerStone's opposition to
4 the Barrera MSJ; and

5 WHEREAS, counsel for CornerStone and Barrera have agreed that an extension is
6 necessary as to the deadline for CornerStone to file its opposition to the Barrera MSJ;

7 WHEREFORE, CornerStone and Barrera, by and through their counsel of record,
8 enter into this Stipulation to modify the Barrera MSJ briefing schedule as follows:

9 1. The deadline for CornerStone to file its opposition to the Barrera MSJ is
10 extended to September 20, 2013; CornerStone's counsel shall provide Barrera's attorneys
11 of record with a courtesy electronic copy of the opposition upon filing; and

12 2. The deadline for Barrera to file its reply is extended to September 27, 2013.

13 DATED: August 28, 2013

HILL, FARRER & BURRILL LLP

14
15 By: 

NEIL D. MARTIN
Attorneys for Plaintiff/Counter-Defendant
CORNERSTONE STAFFING SOLUTIONS,
INC. and Counter-Defendant MARY
ANDERSON

16
17
18 DATED: August 28, 2013

WOOD, SMITH, HENNING & BERMAN LLP

19
20
21 By: 

SEYMOUR B. EVERETT
STEVE R. DISHAROON
Attorneys for Defendant
MARCOS BARRERA

22
23
24 DATED: August , 2013

BURKHARDT & LARSON

25
26 By: _____

PHILIP BURKHARDT
Attorneys for Defendant
MARCOS BARRERA

27
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3 images provided by Barrera, the review of which is critical to CornerStone's opposition to
4 the Barrera MSJ; and

5 WHEREAS, counsel for CornerStone and Barrera have agreed that an extension is
6 necessary as to the deadline for CornerStone to file its opposition to the Barrera MSJ;

7 WHEREFORE, CornerStone and Barrera, by and through their counsel of record,
8 enter into this Stipulation to modify the Barrera MSJ briefing schedule as follows:

9 1. The deadline for CornerStone to file its opposition to the Barrera MSJ is
10 extended to September 20, 2013; CornerStone's counsel shall provide Barrera's attorneys
11 of record with a courtesy electronic copy of the opposition upon filing; and

12 2. The deadline for Barrera to file its reply is extended to September 27, 2013.

13 DATED: August 28, 2013

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MARCOS BARRERA

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1 Based upon the above executed Stipulation extending the time for Plaintiff
2 Cornerstone Staffing Solutions, Inc. (“Cornerstone”) to respond to the Motion of
3 Defendant Marcos Barrera (“Barrera”) for Summary Judgment or, in the Alternative,
4 Partial Summary Judgment [dtk. # 186] (the “Barrera MSJ”), in the above-entitled matter,
5 and for good cause shown, **IT IS ORDERED** as follows:

- 6 1. The Stipulation of the parties is **APPROVED**;
- 7 2. The deadline for CornerStone to file its opposition to the Barrera MSJ is
8 extended to September 20, 2013;
- 9 3. The deadline for Barrera to file any reply to CornerStone’s opposition is
10 extended to September 27, 2013;
- 11 4. Counsel for CornerStone and Barrera shall provide to all attorneys of record
12 in this matter a courtesy electronic copy of the opposition and reply briefs, respectively,
13 immediately upon the filing of the same.

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15 **IT IS SO ORDERED.**

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17 DATED: 8/29/13



HON. RICHARD SEEBORG
UNITED STATES DISTRICT JUDGE

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