LAFAYETTE & KUMAGAI LLP 1 GARY T. LAFAYETTE (State Bar No. 088666) REBECCA K. KIMURA (State Bar No. 220420) 2 100 Spear Street, Suite 600 San Francisco, California 94105 3 Telephone: (415) 357-4600 Facsimile: (415) 357-4605 4 Attorneys for Defendants 5 PACIFIC GAS AND ELECTRIC COMPANY and **PG&E CORPORATION** 6 7 8 UNITED STATES DISTRICT COURT 9 FOR THE NORTHERN DISTRICT OF CALIFORNIA 10 11 STEVEN INGRAM, Case No. CV 12 2777 JST 12 Plaintiff, STIPULATION AND REQUEST TO CONTINUE DEADLINE REGARDING 13 DISCOVERY DISPUTES; [PROPOSED] VS. **ORDER** 14 PACIFIC GAS AND ELECTRIC COMPANY; PG&E CORPORATION and 15 DOES 1 through 20, inclusive, Complaint Filed: May 21, 2012 16 Defendants. 17 18 19 20 21 22 23 24 25 26 27 28

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STIPULATION AND REQUEST

Plaintiff Steven Ingram ("Plaintiff") and Defendants Pacific Gas and Electric Company and PG&E Corporation ("Defendants") (collectively referred to as the "Parties") through their respective counsel hereby stipulate as follows:

WHEREAS on April 28, 2014, the Court issued an Amended Order Deferring Summary Judgment Proceedings (Dkt. No. 150) (the "Order");

WHEREAS paragraph 2 of the Order requires the Parties to meet and confer and propose a special master for appointment by May 12, 2014;

WHEREAS paragraph 4 of the Order requires the Parties to file any other extant discovery disputes by May 12, 2014, to be addressed by Judge Spero; and

WHEREAS the Parties are continuing to meet and confer regarding all outstanding discovery disputes but need additional time to meet the deadlines set forth above;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND REQUESTED by and between the Parties through their respective attorneys of record that the deadline to propose a special master for appointment and the deadline to file any other extant discovery disputes be extended by three days to May 15, 2014.

DATED: Ma	v 12, 2014	SMITH PATTEN

/s/ Spencer F. Smith
SPENCER F. SMITH
Attorneys for Plaintiff
STEVEN INGRAM

DATED: May 12, 2014 LAFAYETTE & KUMAGAI LLP

25	/s/ Rebecca K. Kimura	
36	REBECCA K. KIMURA	
26	Attorneys for Defendants	
27	PACIFIC GAS AND ELECTRIC COMPANY and	
27	PG&F CORPOR ATION	

LAFAYETTE & KUMAGAI LLP

SIGNATURE ATTESTATION

I hereby attest that I have obtained the concurrence of Spencer F. Smith, counsel for Plaintiff, for the filing of this stipulation.

/s/ Rebecca K. Kimura REBECCA K. KIMURA

Good cause appearing therefor and pursuant to the parties' stipulation, it is hereby ORDERED that the deadline to propose a special master for appointment and the deadline to file any other extant discovery disputes be extended by three days to May 15, 2014.

PURSUANT TO STIPULATION, IT IS SO ORDERED

DATED: May 13, 2014

