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MUSICK, PEELER & GARRETT LLP

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Attorneys for Defendants Paragon Systems, Inc. and
Armando Benitez

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

MICHAEL L. CORNER,

Plaintiff,

vs.

PARAGON SYSTEMS, INC. and LT.
ARMANDO BENITEZ,

Defendants.

CASE No. 3:12-cv-04172-EMC
Complaint Filed: August 8, 2012
**STIPULATION TO FURTHER
CONTINUE DATE FOR EXCHANGE OF
INITIAL DISCLOSURES
and
[PROPOSED] ORDER GRANTING
STIPULATION**

1 Plaintiff, on behalf of himself, and defendants Paragon Systems, Inc. and Armando
2 Benitez, through their undersigned counsel, hereby stipulate as follows:

3 The deadline for defendants Paragon Systems, Inc. and Armando Benitez to exchange
4 initial disclosures shall be continued from December 31, 2012 to and including January 29, 2013.

5 The stipulation is necessary for two reasons:

6 (i) The parties previously stipulated that the exchange of initial disclosures shall be
7 fifteen (15) days following the date that plaintiff files an amended complaint. Plaintiff filed his
8 First Amended Complaint on December 11, 2012 so the exchange should occur on December 31,
9 2012. (Note: Plaintiff has stipulated to continue the deadline for Defendants to file its response to
10 the First Amended Complaint from December 26, 2012 to January 8, 2013.)

11 (ii) Defendant Armando Benitez was just served with the Summons and First Amended
12 Complaint on December 13, 2012. This law firm just began its representation of Mr. Benitez and
13 needs time to gather information and documents needed for the initial disclosures.

14 IT IS SO STIPULATED.

15
16 DATED: December 22, 2012

17
18 By: Michael L. Corner
19 Michael L. Corner
20 Plaintiff in pro se

21 DATED: December ____, 2012

MUSICK, PEELER & GARRETT LLP

22
23 By: _____
24 Catherine M. Lee
25 Attorneys for Defendant Paragon Systems, Inc.
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1 Plaintiff, on behalf of himself, and defendants Paragon Systems, Inc. and Armando
2 Benitez, through their undersigned counsel, hereby stipulate as follows:

3 The deadline for defendants Paragon Systems, Inc. and Armando Benitez to exchange
4 initial disclosures shall be continued from December 31, 2012 to and including **January 29, 2013**.

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6 (i) The parties previously stipulated that the exchange of initial disclosures shall be
7 fifteen (15) days following the date that plaintiff files an amended complaint. Plaintiff filed his
8 First Amended Complaint on December 11, 2012 so the exchange should occur on December 31,
9 2012. (Note: Plaintiff has stipulated to continue the deadline for Defendants to file its response to
10 the First Amended Complaint from December 26, 2012 to January 8, 2013.)

11 (ii) Defendant Armando Benitez was just served with the Summons and First Amended
12 Complaint on December 13, 2012. This law firm just began its representation of Mr. Benitez and
13 needs time to gather information and documents needed for the initial disclosures.

14 IT IS SO STIPULATED.

15
16 DATED: December ____, 2012

17
18 By: _____
19 Michael L. Corner
20 Plaintiff in pro se

21 DATED: December 26, 2012

MUSICK, PEELER & GARRETT LLP

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23 By: /s/ Catherine M. Lee
24 Catherine M. Lee
25 Attorneys for Defendants Paragon Systems, Inc.
26 and Armando Benitez
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ORDER

IT IS SO ORDERED.

1/4/13
DATED: _____, 2012



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CERTIFICATE OF SERVICE

STATE OF CALIFORNIA, COUNTY OF SAN FRANCISCO

At the time of service, I was over 18 years of age and **not a party to this action**. I am employed in the County of San Francisco, State of California. My business address is 601 California Street, Suite 1250, San Francisco, California 94108-2817.

On December 26, 2012, I served true copies of the following document(s) described as **STIPULATION TO FURTHER CONTINUE DATE FOR EXCHANGE OF INITIAL DISCLOSURES and [PROPOSED] ORDER GRANTING STIPULATION** Non the interested parties in this action as follows:

SEE ATTACHED SERVICE LIST

BY MAIL: I enclosed the document(s) in a sealed envelope or package addressed to the persons at the addresses listed in the Service List and placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with Musick, Peeler & Garrett LLP's practice for collecting and processing correspondence for mailing. On the same day that the correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on December 26, 2012, at San Francisco, California.



Katrina M. Ruiz

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SERVICE LIST

Michael J. Corner
1331 Jefferson Avenue, #308
Redwood City, CA 94062

Plaintiff in pro se
Tel: (415) 999-0797