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8 UNITED STATES DISTRICT COURT
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA
10

11 SERVICE EMPLOYEES INTERNATIONAL) Case No.: CV 12 4494 JST
UNION NATIONAL INDUSTRY PENSION)
12 FUND; STEPHEN ABRECHT, Trustee, ROD)
BASHIR, Trustee; KEVIN J. DOYLE, Trustee;) **STIPULATION AND [PROPOSED]**
13 MYRIAM ESCAMILLA, Trustee; STEVEN W.) **ORDER TO EXTEND NON-EXPERT**
FORD, Trustee; EDWARD J. MANKO,) **DISCOVERY COMPLETION DATE**
14 Trustee; FRANK A. MAXSON, Trustee; JOHN)
J SHERIDAN, Trustee; LARRY T. SMITH,)
15 Trustee; DAVID STILWELL, Trustee,) **Trial Date: August 25, 2014**
)
16 Plaintiff,)
)
17 vs.)
)
18 EMPLOYEE EQUITY ADMINISTRATION,)
INC., a California corporation, d/b/a Westline)
19 Medical Management, et al.)
)
20 Defendants.)
)

21
22 Pursuant to Civil Local Rule 6-2, all Parties to this action, by and through their counsel of
23 record, hereby stipulate and request the Court to extend the non-expert discovery completion date
24 until March 21, 2014, for the reasons set forth below.

25 WHEREAS Plaintiffs' filed a separate discovery letter brief in the above-captioned case
26 (Dkt. No. 57) and on February 7, 2014, Judge Tigar referred any outstanding discovery disputes to
27 Magistrate Judge Kandis Westmore (Dkt. No. 58).
28

1 WHEREAS, on February 11, 2014, Magistrate Judge Westmore issued an Order
2 Regarding Plaintiffs' Discovery Letter Brief and ordered the parties to further meet and confer
3 (Dkt. No. 59) on the discovery disputes. Judge Westmore also suggested that the parties consider
4 requesting an extension of the fact discovery deadline in light of the outstanding discovery
5 disputes.

6 WHEREAS, the parties wish to extend the discovery cut-off date to provide sufficient time
7 for the parties to meet and confer regarding outstanding discovery disputes and to re-schedule
8 previously noticed depositions;

9 WHEREAS, the current non-expert discovery cut-off date is February 14, 2014;

10 WHEREAS, the discovery cut-off date was previously continued once by Judge Tigar's
11 November 6, 2013 Scheduling Order (Dkt. #55) to February 14, 2014;

12 WHEREAS, this stipulation and proposed order if issued, would affect the deadlines set by
13 the Court on November 6, 2013 in the Scheduling Order as to the non-expert discovery cut-off
14 date as to the parties;

15 IT IS HEREBY STIPULATED AND AGREED by and between the as follows:

16 1. The non-expert discovery cut-off date as to discovery between the parties for the
17 purpose of providing sufficient time for the parties to meet and confer regarding outstanding
18 discovery disputes and to re-schedule previously noticed depositions is extended until March 21,
19 2014.

20 2. The last day for the parties to file a motion to compel fact discovery is extended
21 until March 28, 2014.

22

23 **SO STIPULATED.**

24 Date: February 13, 2014

SALTZMAN & JOHNSON LAW CORPORATION

25

26

By: _____/S/

KIMBERLY A. HANCOCK

27

Attorneys for Plaintiffs

28

1 Date: February 13, 2014

2 By: _____ /S/
3 SHELLEY R. BUCHANAN, Attorneys for Defendants,
4 Employee Equity Administration, Inc., et al.

5 Date: February 13, 2014

JACKSON LEWIS LLP

6 By: _____ /S/
7 DOUGLAS A. RUBEL
8 Attorneys for Defendants Sol Healthcare LLC,
9 Solnus Two, LLC; Solnus Three, LLC;
10 Solnus Four, LLC; Solnus Eight, LLC; Sol Majer; and
11 Shlomo Rechnitz

12 I, Kimberly A. Hancock, hereby attest, pursuant to N.D. Cal. General Order No. 45, that
13 concurrence to the filing of this document authority has been obtained from each signatory hereto.

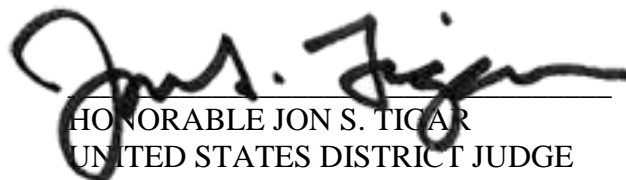
14 **~~PROPOSED~~ ORDER**

15 PURSUANT TO STIPULATION, IT IS SO ORDERED. The Scheduling Order is hereby
16 modified as follows:

17 1. The non-expert discovery cut-off date as to discovery between the parties for the
18 purpose of providing sufficient time for the parties to meet and confer regarding outstanding
19 discovery disputes and to re-schedule previously noticed depositions is extended until March 21,
20 2014.

21 2. The last day for the parties to file a motion to compel fact discovery is extended
22 until March 28, 2014.

23 Dated: February 14, 2014

24 
25 HONORABLE JON S. TIGAR
26 UNITED STATES DISTRICT JUDGE