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13 Attorneys for Defendant  
 DHL EXPRESS (USA), INC.

14 UNITED STATES DISTRICT COURT  
 15 NORTHERN DISTRICT OF CALIFORNIA

17 ELIA CASTANEDA,  
 18 Plaintiff,

19 v.

20 DHL EXPRESS (USA), INC. dba DHL  
 21 EXPRESS, INC. and DOES ONE through  
 22 twenty, inclusive,  
 23 Defendants.

Case No. C 12-05182 (JSC)

AMENDED

**STIPULATION AND ~~[PROPOSED]~~  
 ORDER TO CONTINUE DEADLINES**

1 Plaintiff ELIA CASTANEDA (“Plaintiff”) and Defendant DHL EXPRESS (USA), INC.  
2 (“Defendant”) by and through their counsel of record herein, hereby stipulate and agree as  
3 follows:

4 WHEREAS, the Court issued a Pretrial Order on January 31, 2013, ordering the parties  
5 to, among other things, complete discovery by September 27, 2013 and disclose their final round  
6 of experts by November 8, 2013;

7 WHEREAS, the parties participated in a mediation on May 21, 2013 before Jamie  
8 Dupree, Esq. and delayed taking depositions pending the results of the mediation;

9 WHEREAS, the parties were unsuccessful in resolving the case at mediation;

10 WHEREAS, the parties have agreed to participate in a settlement conference before  
11 Magistrate Judge Nandor J. Vadas tentatively scheduled for August 28, 2013 at 2:00 p.m.;

12 WHEREAS, the parties would like to continue to delay taking depositions until after the  
13 settlement conference to increase chances of settlement by keeping costs down;

14 WHEREAS, the parties agree that continuing the current pre-trial deadlines will not  
15 prejudice any party in this case;

16 NOW, THEREFORE, THE PARTIES HEREBY STIPULATE AND AGREE to extend  
17 the following pre-trial deadlines set by the Court on January 31, 2013, as follows:

- 18 1. Close of Fact Discovery from September 27, 2013 to December 20, 2013
- 19 2. Last Day to Disclose Experts from November 8, 2013 to January 31, 2013
- 20 3. Hearing Dispositive Motions from December 12, 2013 at 9:00 a.m. to February 14,  
21 2014 at 9:00 a.m.
- 22 4. Close of Expert Discovery from January 24, 2014 to February 27, 2014
- 23 5. Pre-trial Conference from March 6, 2014 at 8:30 a.m. to March 13, 2014 at 8:30 a.m.

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1 The parties do not propose any changes to the dates set for Jury Trial (March 24, 2014 at  
2 8:30 a.m.).

3 Dated: August 15, 2013

LAW OFFICES OF STEPHEN M. MURPHY

4 By: /s/ P. Bobby Shukla  
5 STEPHEN M. MURPHY  
6 P. BOBBY SHUKLA  
7 Attorneys for Plaintiff  
8 ELIA CASTANEDA

9 Dated: August 15, 2013

LITTLER MENDELSON

10 By: /s/ Neda N. Dal Cielo  
11 NEDA N. DAL CIELO  
12 Attorneys for Defendant  
13 DHL EXPRESS (USA), INC.

14 **IT IS SO ORDERED.** Last day to hear dispositive motion: 2/13/2014. Pretrial conference is reset  
15 to 3/13/2013 at 2:00 p.m.

16 Dated: August 15, 2013

17 By: Jacqueline S. Corley  
18 JACQUELINE SCOOT CORLEY  
19 UNITED STATES DISTRICT JUDGE  
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