

1 DAVID A. ROSENFELD, Bar No. 058163  
ANNE I. YEN, Bar No. 187291  
2 WEINBERG, ROGER & ROSENFELD  
A Professional Corporation  
3 1001 Marina Village Parkway, Suite 200  
Alameda, California 94501  
4 Telephone (510) 337-1001  
Fax (510) 337-1023  
5 E-Mail: drosenfeld@unioncounsel.net  
ayen@unioncounsel.net

6 Attorneys for Defendant, **Teamsters Local Union No. 948**

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

11 RICHARD CUEVAS, DANIEL ABRIL, JOHN  
HAILSTONE, AL T. OLIVER, CHARLES K.  
12 WILLIAMS, SHARON MOSLEY,

13 Plaintiffs,

14 v.

15 JOINT BENEFIT TRUST AND TEAMSTERS  
LOCAL UNION NO. 948,

16 Defendants.  
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No. C 13 0045-JST

**STIPULATION AND ~~PROPOSED~~  
ORDER TO EXTEND DISCOVERY  
DEADLINES**

19  
20 Whereas, on April 10, 2013, the Court entered an Order (Document 20) setting fact  
21 discovery cutoff on August 16, 2013, expert disclosures on October 4, expert rebuttal disclosures  
22 on November 1, and expert discovery cutoff on November 22;

23 Whereas, the deadline to file dispositive motions is not until January 24, 2014, and trial is  
24 scheduled on April 28, 2014, allowing sufficient time that a 60-day extension of the discovery  
25 deadlines would not require a change in the trial date;

26 Whereas, on June 25, 2013, Defendant Teamsters Local 948 filed a motion to disqualify  
27 Plaintiffs' counsel, on the grounds that Plaintiffs' counsel formerly represented Defendant and  
28 Defendant contends that Plaintiffs' counsel has a conflict, and that motion is scheduled to be

1 heard on August 29, 2013;

2           Whereas, Plaintiffs seek to take the depositions of officers and employees of Defendant,  
3 and Defendant objects to submitting to examination by Plaintiffs' counsel while the motion to  
4 disqualify him is pending;

5           Now, therefore, the parties hereby stipulate as follows:

6           The depositions of Defendant's Secretary-Treasurer Adam Ochoa and Defendant's  
7 business agent Luis Diaz, noticed for August 2, are cancelled;

8           To allow time for the parties to complete discovery after the Court decides the motion to  
9 disqualify, which is scheduled to be heard on August 29, the parties jointly request an extension  
10 of the discovery deadlines by 60 days, which will reschedule the deadlines as follows:

11           Fact discovery cutoff: October 15, 2013;

12           Expert disclosures: December 3, 2013;

13           Expert rebuttal disclosures: December 31, 2013;

14           Expert discovery cutoff: January 21, 2014.

15           Respectfully submitted.

16 Dated: August 1, 2013

WEINBERG, ROGER & ROSENFELD  
A Professional Corporation

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18           By: /s/ Anne I. Yen  
19                     DAVID A. ROSENFELD  
20                     ANNE I. YEN  
                          Attorneys for Defendant,  
                          TEAMSTERS LOCAL UNION NO. 948

21  
22 Dated: August 1, 2013

LAW OFFICE OF KENNETH C. ABSALOM

23           By: /s/ Kenneth C. Absalom  
24                     KENNETH C. ABSALOM  
25                     Attorneys for Plaintiffs

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Dated July 31, 2013

BEESON, TAYER & BODINE

/s/ Dalisai S. Nisperos  
TEAGUE P. PATERSON  
DALISAI S. NISPEROS  
Attorneys for Defendant Joint Benefit Trust

~~PROPOSED~~ ORDER

The Court having considered the above Stipulation of the parties, and good cause appearing, the discovery deadlines in the above-captioned matter are hereby extended as follows:

- Fact discovery cutoff: October 15, 2013;
- Expert disclosures: December 3, 2013;
- Expert rebuttal disclosures: December 31, 2013;
- Expert discovery cutoff: January 21, 2014.

IT IS SO ORDERED.

Dated: August 12, 2013

  
UNITED STATES DISTRICT COURT  
JUDGE JON S. TIGAR

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