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6 Attorneys for Defendants  
 SHANGHAI ZHENHUA HEAVY  
 7 INDUSTRIES CO., LTD. (erroneously  
 sued as SHANGHAI ZHENHUA  
 8 PORT MACHINERY CO., LTD) AND  
 SEASIDE TRANSPORTATION SERVICES, LLC  
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**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION**

JACKIE ARNETT,  
 Plaintiff,  
 vs.  
 SHANGHAI ZHENHUA PORT MACHINERY  
 CO. LTD.; SEASIDE TRANSPORTATION  
 SERVICES, LLC; WHITNEY EQUIPMENT  
 LLC; and DOES 1 through 100, inclusive,  
 Defendants.

Case No. 13-cv-01672  
**STIPULATION AND ~~PROPOSED~~  
 ORDER TO EXTEND DEADLINES**  
 Judge: Hon. Vince G. Chhabria  
 Complaint Filed: March 1, 2013

1           WHEREAS, Plaintiff Jackie Arnett filed her complaint for damages naming only Defendants  
2 Whitney Equipment LLC (“Whitney”) and Seaside Transportation Services, LLC (“STS”) in  
3 Alameda County Superior Court on March 1, 2013.

4           WHEREAS defendants Whitney and STS removed this case to the Northern District on April  
5 12, 2013.

6           WHEREAS on September 13, 2013, Plaintiff filed a First Amended Complaint adding  
7 defendant Shanghai Zhenhua Heavy Industries Co., Ltd. (erroneously sued as Shanghai Zhenhua Port  
8 Machinery Co., Ltd., hereinafter “ZPMC”.)

9           WHEREAS Plaintiff filed as Second Amended Complaint on November 4, 2013 in response  
10 to ZPMC’s motion to dismiss Plaintiff’s First Amended Complaint.

11           WHEREAS ZPMC filed a motion to dismiss Plaintiff’s Second Amended Complaint, which  
12 was granted in part and denied in part on January 13, 2014.

13           WHEREAS The Court granted Plaintiff leave to amend her negligence allegations in order to  
14 clarify what conduct each defendant has allegedly engaged in that supports each of the theories  
15 underlying her negligence causes of action.

16           WHEREAS Plaintiff filed her Third Amended Complaint on February 3, 2014, and parties  
17 responded.

18           WHEREAS the Court set a Pre-trial Scheduling Order on April 1, 2014.

19           WHEREAS the Court amended the Pre-trial Scheduling Order on February 2, 2015, and  
20 ordered parties to complete expert discovery by April 3, 2015.

21           WHEREAS parties have completed all noticed expert depositions except for the deposition of  
22 Plaintiff’s expert Louis Cheng due to schedule conflicts.

23           WHEREAS parties are available to depose Mr. Cheng on April 10, 2015.

24           WHEREAS parties now request an extension of the expert discovery deadline for the limited  
25 purpose of completing Mr. Cheng’s deposition on April 10, 2015.

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1 NOW THEREFORE, IT IS STIPULATED by and between the parties, subject to the approval  
2 of the Court pursuant to Local Rule 6-2, to extend discovery deadlines set in the case schedule (Dkt.  
3 Nos. 69, 84, 95) as follows:  
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EVENT	CURRENT DEADLINE	REQUESTED EXTENSION DATE
Close of Expert Discovery for the Limited Purpose of Deposing Mr. Louis Cheng	April 3, 2015	April 10, 2015
Dispositive Motions Heard by	May 28, 2015	May 28, 2015 (no extension requested)

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**K&L GATES LLP**

Dated: 4/7/15

By: *Michelle C Barnes*  
MICHELE C. BARNES  
ROSEANNA M. CASTILLO  
Attorneys for Defendants  
SHANGHAI ZHENHUA PORT  
MACHINERY CO., LTD

**ARCHER NORRIS**

Dated: 4/7/15

By: /s/ Keith R. Gillette  
KEITH R. GILLETTE  
CHAD D. GREESON  
Attorneys for Defendant  
WHITNEY EQUIPMENT, LLC

**WILSON ELSER LLP**

Dated: 4/7/15

By: /s/ William Enger  
William Enger  
Attorneys for Defendant SEASIDE  
TRANSPORTATION SERVICES

**THE ARNS LAW FIRM**

Dated: *4.3.15*

By: *[Signature]*  
ROBERT S. ARNS  
JONATHAN E. DAVIS  
Attorneys for Plaintiff  
JACKIE ARNETT

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**PURSUANT TO STIPULATION, IT IS SO ORDERED**

Dated: April 8, 2015

By:



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Hon. Vince G. Chhabria  
U.S. District Court Judge