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7 Attorneys for Defendant,
8 Yale Industrial Products, Inc.

8 **UNITED STATES DISTRICT COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

11 BRIAN CORNELL,
12 Plaintiff,

Case No. 3:13-cv-02188 SI
Hon. Susan Illston
Courtroom 1

13 v.

14 COLUMBUS McKINNON
15 CORPORATION; AUTOQUIP
16 CORPORATION, YALE
17 INDUSTRIAL PRODUCTS, INC. and
18 DOES 1-200, inclusive,
Defendant.

**STIPULATION AND ~~PROPOSED~~
ORDER TO CONTINUE HEARING
ON YALE INDUSTRIAL
PRODUCTS, INC.'S MOTION TO
CONTINUE AND REOPEN
DISCOVERY AS TO DAMAGES
ONLY AND CONTINUE TRIAL,
OR, IN THE ALTERNATIVE,
BIFURCATE TRIAL**

19 IT IS HEREBY stipulated by and between the parties below as follows:

20 WHEREAS, Counsel for the parties are currently discussing Yale's pending Motion to Re-
21 Open Discovery as to Damages Only, and need additional time to meet and confer concerning the
22 scope of any further discovery;

23 WHEREAS, Counsel for all parties have met and conferred and agreed to a short
24 continuation of the hearing date;

25 THE PARTIES STIPULATE THAT:

26 The hearing on Defendant Yale Industrial Products, Inc.'s Motion Continue and Reopen
27 Discovery as to Damages Only and Continue Trial, or, in the Alternative, Bifurcate Trial, currently
28 set for April 1, 2016 at 9:00 a.m., be continued for one week to April 8, 2016 at 9:00 a.m., or as

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1 soon thereafter as the Court’s calendar allows, and that plaintiff’s opposition briefing due date be
2 extended by one week, from March 11, 2016 to March 18, 2016, and Yale’s reply briefing due
3 date also be extended by one week.

4 I agree to and accept the foregoing stipulation.

5 Dated: March 11, 2016 WALKUP, MELODIA, KELLY & SCHOENBERGER

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7
8 /s/ Khaldoun A. Baghdadi
9 KHALDOUN A. BAGHDADI
Attorneys for Plaintiff

10 Dated: March 11, 2016 HAIGHT BROWN & BONESTEEL LLP

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12
13 /s/ Krsto Mijanovic
14 KRSTO MIJANOVIC
Attorneys for Defendants

15 Pursuant to the stipulation of the parties, and good cause appearing,

16 IT IS ORDERED THAT:

17 The hearing on Defendant Yale Industrial Products, Inc.’s Motion Continue and Reopen
18 Discovery as to Damages Only and Continue Trial, or, in the Alternative, Bifurcate Trial, currently
19 set for April 1, 2016 at 9:00 a.m., be continued for one week to April 8, 2016 at 9:00 a.m. in
20 Courtroom 1 of this Court, and that plaintiff’s opposition briefing due date be extended by one
21 week, from March 11, 2016 to March 18, 2016, and Yale’s reply briefing be extended by one
22 week.
23

24 Dated: 3/11/16

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27 HON. SUSAN ILLSTON
28 SENIOR DISTRICT JUDGE