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Cornell v. Columbus McKinnon Corporation et al

Doc. 134

1	IT IS HEREBY stipulated by and between the parties as follows:	
2	WHEREAS, on February 26, 2016, Defendants filed a Motion to Continue	
3	and Reopen Discovery as to Damages Only and Continue Trial, or, in the	
4	Alternative, Bifurcate Trial;	
5	WHEREAS, Counsel for all parties have conferred and agreed, subject to the	
6	Court's consent, to reopen discovery as to damages only;	
7	THE PARTIES STIPULATE THAT:	
8	Yale's Motion to Continue and Reopen Discovery as to Damages Only and	
9	Continue Trial, or, in the Alternative, Bifurcate Trial, shall be withdrawn upon the	
10	Court granting this Stipulation;	
11	On or before March 29, 2016, Plaintiff shall provide Defendants with updated	
12	medical records, including for his recent revision surgery, and thereafter continue to	
13	do so through the date of trial;	
14	Plaintiff agrees to submit to a further independent medical examination by Dr	
15	Lawrence Oloff, DPM, FACFAS, at a mutually agreeable date and time;	
16	It is further agreed that, should Yale seek additional damages discovery, the	
17	parties will meet and confer regarding the same, and avail themselves of the Court's	
18	joint discovery letter practice, if necessary.	
19	I agree to and accept the foregoing stipulation.	
20	DATED: March 15, 2016 WALKUP, MELODIA, KELLY & SCHOENBERGER	
21		
22	<u>/s/ Khaldoun A. Baghdadi</u> KHALDOUN A. BAGHDADI	
23	Attorneys for Plaintiff	
24		
25	DATED: March 15, 2016 HAIGHT BROWN & BONESTEEL LLP	
26	/s/ Krsto Mijanovic	
27	KRSTO MIJANOVIC Attorneys for Defendants	
20	Audilicys for Detendants	

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2	Pursuant to the stipulation of
3	IT IS ORDERED THAT:
4	Defendant Yale Industrial P
5	Reopen Discovery as to Damages
6	Bifurcate Trial, is withdrawn, and
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8	DATED: March <u>16</u> , 2016
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Pursuant to the stipulation of the parties, and good cause appearing, IT IS ORDERED THAT:

Defendant Yale Industrial Products, Inc.'s pending Motion to Continue and Reopen Discovery as to Damages Only and Continue Trial, or, in the Alternative, Bifurcate Trial, is withdrawn, and discovery is reopened as to damages only.

Suran Illaton

Hon. Susan Illston United States District Judge