

1 Susan Kumagai
 2 Cal. Bar No. 127667
 3 skumagai@lkclaw.com
 4 Rebecca K. Kimura
 5 Cal. Bar No. 220420
 6 rkimura@lkclaw.com
 7 LAFAYETTE & KUMAGAI LLP
 8 100 Spear Street, Suite 600
 9 San Francisco, California 94105
 10 T: 415-357-4600 | F: 415- 357-4605

11 Stephen L. Scott (*pro hac vice*)
 12 Ala. Bar No. ASB-7280-O62S
 13 sls@kullmanlaw.com
 14 F. Daniel Wood Jr. (*pro hac vice*)
 15 Ala. Bar No. ASB-6822-D65F
 16 fdw@kullmanlaw.com
 17 THE KULLMAN FIRM
 18 600 University Park Place, Suite 340
 19 Birmingham, Alabama 35209
 20 T: 205-871-5858 | F: 205-871-5874

21 Attorneys for Defendant, Computer Sciences Corporation

22 **UNITED STATES DISTRICT COURT**
 23 **NORTHERN DISTRICT OF CALIFORNIA**
 24 **SAN FRANCISCO DIVISION**

18	FRED NAZIF, an individual,)	Case No. C13-05498 EMC
)	
19	Plaintiff,)	STIPULATION AND [PROPOSED]
)	ORDER TO CONDUCT
20	v.)	DEPOSITIONS OUT OF TIME
)	
21	COMPUTER SCIENCES)	
22	CORPORATION, a Nevada Corporation,)	
23	and DOES 1-50, inclusive,)	
)	
24	Defendants.)	

25
 26 COME NOW the parties in this action, Plaintiff Fred Nazif and Defendant Computer

1 Sciences Corporation, through their respective counsel, and hereby stipulate to taking the
2 depositions of former CSC Technical Accountant April Hand and former GSS Controller
3 Stephanie Mayes two and four days, respectively, beyond the cut-off for non-expert discovery
4 and in support thereof say:

5 1. Whereas, April Hand and Stephanie Mayes are both under subpoena for
6 depositions within the non-expert discovery period in this action.

7 2. Whereas, however, April Hand resides in Homer, Louisiana, which is currently
8 experiencing severe winter weather and expected to experience additional severe winter weather,
9 which will interfere with the current deposition setting. (For example, CSC's counsel's flight
10 has already been canceled by the airline, and the witness reports that the courthouse and other
11 businesses are closed due to dangerous travel conditions.)

12 3. Whereas, however, Stephanie Mayes' sister's death from cancer is imminent and
13 the likely service arrangements will conflict with the current deposition setting.

14 4. Whereas, Ms. Hand has agreed to be deposed on March 11, 2015, Ms. Mayes has
15 agreed to be deposed on March 13, 2015, and counsel for both parties also agree to these dates.

16 5. And Whereas, non-expert discovery closes in this matter on March 9, 2015, but
17 taking these depositions out of time as described herein is not expected to otherwise disrupt the
18 Scheduling Order for this case or its timely prosecution.

19 IT IS THEREFORE STIPULATED AND AGREED AS FOLLOWS: the depositions of
20 April Hand and Stephanie Mayes may be taken out of time, as described herein.

21 In accordance with Northern District of California General Order 45, the filer of this
22 document hereby attests that concurrence in the filing of this document has been obtained from
23 the other signatory hereto.

24 IT IS SO STIPULATED:

25 DATED February 24, 2015

Le Clerc & Le Clerc LLP

26 By: /s/ Christopher R. LeClerc
27 Christopher R. LeClerc, Esq.

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Attorney for Plaintiff, Fred Nazif

DATED February 24, 2015

The Kullman Firm

By: /s/ F. Daniel Wood Jr.
F. Daniel Wood Jr. (*pro hac vice*)

Attorneys for Defendant,
Computer Sciences Corporation

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ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED

DATE: 2/24/15

