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Attorneys for Defendant  
 UNIVERSAL CABLE HOLDINGS, INC., dba  
 SUDDENLINK COMMUNICATIONS

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA

KEITH AMBROSINI,  
  
 Plaintiff,  
  
 v.  
  
 UNIVERSAL CABLE HOLDINGS, INC.,  
 DBA SUDDENLINK COMMUNICATIONS,  
 and DOES 1 through 100, inclusive,  
  
 Defendants.

Case No. 3:14-cv-00896-RS

**STIPULATION AND ~~[PROPOSED]~~  
 ORDER FOR LIMITED  
 MODIFICATION TO SCHEDULING  
 ORDER**

1 Pursuant to Local Rule 6-1(b), Plaintiff KEITH AMBROSINI (“Plaintiff”), on the one  
2 hand, and Defendants UNIVERSAL CABLE HOLDINGS, INC., dba SUDDENLINK  
3 COMMUNICATIONS, (“Defendant”), by and through their undersigned counsel, hereby  
4 stipulate as follows:

5 WHEREAS, the Court entered a Case Management Scheduling Order on May 29, 2014  
6 (the “Scheduling Order”). (Dkt. 24.)

7 WHEREAS the Scheduling Order requires discovery to be completed on or before  
8 January 30, 2015.

9 WHEREAS, Plaintiff requires additional time to take the depositions of two witnesses,  
10 Aaron Byer and Casey Kelly, due to the unavailability of these witnesses until February 20,  
11 2015.

12 WHEREAS, dispositive motions in this case are to have been completed and filed by  
13 February 12, 2015, with hearing dates scheduled for no later than March 19, 2015. However,  
14 given Plaintiff’s need to extend the discovery deadline as to the above-mentioned witnesses, the  
15 dispositive motions and hearing deadlines will also need to be continued. The Parties, therefore,  
16 seek a 21-day extension to complete and file their pre-trial dispositive motions, if any, until  
17 March 5, 2015. The pre-trial dispositive hearing deadline will consequently also require  
18 continuation, until April 9, 2015.

19 WHEREAS, the additional time the Parties seek will not alter the current trial date set for  
20 June 8, 2015.

21 IT IS THEREFORE STIPULATED that:

22 1. The deadline to complete Plaintiff’s depositions of witnesses Aaron Byer and  
23 Casey Kelly will be continued until February 20, 2015.

24 2. The deadline to complete and file any pre-trial dispositive motions will be  
25 continued from February 12, 2015 until March 5, 2015. The hearing dates for any pre-trial  
26 dispositive motions will be continued from March 19, 2015 until April 9, 2015.

27 IT IS SO STIPULATED.  
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DATED: January 28, 2015

SEYFARTH SHAW LLP

By:           /s/ *Nicholas R. Clements*

Laura Wilson Shelby  
Coby M. Turner  
Nicholas R. Clements

Attorneys for Defendant  
UNIVERSAL CABLE HOLDINGS, INC., dba  
SUDDENLINK COMMUNICATIONS

DATED: January 28, 2015

LAW OFFICE OF BRADFORD C. FLOYD

By:           /s/ *Bradford C. Floyd*

Bradford C. Floyd  
Carlton D. Floyd

Attorneys for Plaintiff  
KEITH AMBROSINI

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~~PROPOSED~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

1. The deadline to complete Plaintiff's depositions of witnesses Aaron Byer and Casey Kelly will be continued until February 20, 2015.

2. The deadline to complete and file any pretrial dispositive motions will be continued from February 12, 2015 until March 5, 2015. The hearing dates for any pre-trial dispositive motions will be continued from March 19, 2015 until April 9, 2015.

DATED: 1/28/2015

  
\_\_\_\_\_  
HON. RICHARD SEEBORG  
United States District Court Judge