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14
 15 UNITED STATES DISTRICT COURT
 16 NORTHERN DISTRICT OF CALIFORNIA
 17 SAN FRANCISCO/OAKLAND DIVISION

18 RICHARD WEIL and SOODABEH
 SHAKERIN,
 19 Plaintiffs,
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 v.
 21 WELLS FARGO BANK, NATIONAL
 22 ASSOCIATION; RAISSA DEMAY; and
 DOES 1-25, INCLUSIVE,
 23 Defendants.
 24

Case No. 3:14-CV-3110-HSG
 STIPULATION REGARDING PRETRIAL
 DATES AND ORDER

1 **TO THE HONORABLE COURT AND ALL PARTIES AND THEIR**
2 **COUNSEL OF RECORD:**

3 Pursuant to the Court's Order dated March 18, 2015, Plaintiffs Richard Weil and
4 Soodabeh Shakerin (collectively, "Plaintiffs") and Defendants Wells Fargo Bank, National
5 Association and Raissa Demay (collectively, "Defendants"), by and through the parties'
6 respective counsel of record, hereby stipulate as follows:

7 WHEREAS, the Hon. Vince Chhabria of this Court previously set the following
8 pretrial and trial schedule:

9 Fact Discovery Cut-Off:	April 7, 2015
10 Motion Filing Cut-Off:	May 29, 2015
11 Parties' Expert Witness Disclosure Cut-Off:	July 10, 2015
12 Parties' Expert Rebuttal Witness Disclosure Cut-Off:	August 7, 2015
13 Expert Discovery Cut-Off:	September 11, 2015
14 Trial:	October 19, 2015;

15 WHEREAS, on February 18, 2015, the Court reassigned this case to Hon. Haywood
16 S. Gilliam, Jr. as the presiding judge in this matter;

17 WHEREAS, the parties have been diligent in conducting discovery, including
18 without limitation serving and responding to multiple sets of written discovery, exchanging
19 various sets of documents and scheduling depositions of the parties and certain witnesses;

20 WHEREAS, due to the parties' and their counsels' scheduling issues (including the
21 fact that Defendants' lead counsel was unavailable due to a family health emergency and a
22 trial in another matter and that Defendants' new lead counsel, who appeared in this matter
23 to prevent undue delay, needed some time to familiarize himself with this matter), the
24 parties need additional time to conduct remaining discovery, prepare motions and
25 otherwise prepare this matter for trial;

26 WHEREAS, the parties also have scheduled a private mediation for April 24, 2015,
27 and the date has been confirmed by all parties and the private mediator;

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1 WHEREAS, the parties intend to focus their time and resources toward that
2 mediation—including without limitation conducting key discovery (including depositions),
3 resolving certain (but not all) discovery issues, and preparing mediation briefs—all in a
4 good faith effort to resolve this matter informally; and

5 WHEREAS, the current deadlines will interfere with the parties' ability to focus the
6 remaining discovery issues toward a good faith mediation and will force the parties to
7 expend resources that could be dedicated toward that mediation, and the unnecessary
8 expenditure of such resources could create roadblocks to an informal resolution.

9 NOW, THEREFORE, the parties hereby stipulate and request that, based on good
10 cause set forth above, the Court continue all pretrial and trial dates to the following
11 proposed dates, or to dates thereafter based on the Court's availability:

12 Fact Discovery Cut-Off:	May 15, 2015
13 Motion Filing Cut-Off:	June 4, 2015
14 Parties' Expert Witness Disclosure Cut-Off:	July 29, 2015
15 Parties' Expert Rebuttal Witness Disclosure Cut-Off:	August 28, 2015
16 Expert Discovery Cut-Off:	September 18, 2015
17 Final Pre-Trial Conference	October 5, 2015
18 Trial:	October 19, 2015

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IT IS SO STIPULATED.

1 Dated: March 19, 2015

ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP

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By: /s/ Benjamin J. Kim

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Pursuant to Local Rule 5-1(i)(3), I, the
electronic filer of this document, hereby
attest that I have received permission
from the other signatory to this document
to file it.

Dated: March 19, 2015

LAW OFFICES OF PAUL B. JUSTI

By: /s/ Paul B. Justi

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RICHARD WEIL and SOODABEH
SHAKERIN

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ORDER

Pursuant to the parties' Stipulation and good cause having been established, the Court grants the parties' request to continue the current discovery and motion deadlines and sets the case schedule as follows:

- Fact Discovery Cut-Off: May 15, 2015
- Motion Filing Cut-Off: June 4, 2015
- Parties' Expert Witness Disclosure Cut-Off: July 29, 2015
- Parties' Expert Rebuttal Witness Disclosure Cut-Off: August 28, 2015
- Expert Discovery Cut-Off: September 18, 2015
- Final Pre-Trial Conference: October 6, 2015
- Trial: October 19, 2015

All other deadlines in this matter set by the Federal Rules of Civil Procedure and Local Rules shall be based on the dates above, as applicable.

IT IS SO ORDERED.

Dated: 3/20/2015


 HONORABLE HAYWOOD S. GILLIAM, JR.