

1 MICHAEL G. MILLER, (SBN 136491)
 SCOTT LEWIS, (SBN 149094)
 2 HEATHER-ANN T. YOUNG (SBN 283211)
 PERRY, JOHNSON, ANDERSON,
 3 MILLER & MOSKOWITZ, LLP
 438 1st Street, 4th Floor
 4 Santa Rosa, California 95401
 Telephone: (707) 525-8800
 5 Facsimile: (707) 545-8242

6 Attorneys for Plaintiff

7 UNITED STATES DISTRICT COURT
 8 NORTHERN DISTRICT OF CALIFORNIA

9 SARA McENROE,

Case No. C-14-03461 HSG

10 Plaintiff,

STIPULATION

11 v.

12 LOCAL 9400, COMMUNICATIONS
 WORKERS OF AMERICA, AFL-CIO, a
 13 Labor Organization; DISTRICT 9,
 COMMUNICATIONS WORKERS OF
 14 AMERICA, AFL-CIO, a Labor
 organization; COMMUNICATIONS
 15 WORKERS OF AMERICA, AFL-CIO, a
 Labor Organization; and DOES 1 through
 16 20, inclusive,

Date: November 12, 2015
 Time: 2:00 p.m.
 Dept.: Courtroom 15, 18th Floor
 Judge: Hon. Haywood S. Gilliam, Jr.

17 Defendants. /

18 IT IS HEREBY STIPULATED AND AGREED by and between the parties hereto and their
 19 respective counsel that:

20 1) The deposition of Tom Runnion was originally noticed for November 2, 2015 by
 21 Plaintiff's counsel on October 15, 2015.

22 2) Mr. Runnion and Defendant's counsel were not available on this date and are
 23 unable to attend until November 17, 2015.

24 3) November 13, 2015 is the deadline for close of non-expert discovery as set by Order
 25 Scheduling Trial and Pretrial Matters dated December 15, 2014 and signed by Jeffrey S.
 26 White, ECF 33.

27 ///

28

PERRY, JOHNSON, ANDERSON,
MILLER & MOSKOWITZ LLP

PERRY, JOHNSON, ANDERSON,
MILLER & MOSKOWITZ, LLP

1 4) All parties have stipulated to allow this deposition to occur after the deadline for
2 non-expert discovery on November 17, 2015


3 5) The parties do not anticipate this altering any other case deadlines set forth in the
4 December 15, 2014 Scheduling Order signed by Judge White.

5 6) Pursuant to Federal Rules of Civil Procedure, 29(b), the parties are requesting court
6 approval for this extension of the deadline for this deposition.

7 IT IS SO STIPULATED.


8 PERRY, JOHNSON, ANDERSON,
9 MILLER & MOSKOWITZ, LLP

10 DATED: October 28, 2015

11 By: 
12 MICHAEL G. MILLER
13 SCOTT LEWIS
14 HEATHER ANN T. YOUNG
15 Attorneys for Plaintiff
16 SARA MCENROE

WEINBERG, ROGER & ROSENFELD

17 DATED: October 29, 2015

18 By: 
19 DAVID A. ROSENFELD
20 ANNE I. YEN
21 Attorneys for Defendant
22 LOCAL 9400, COMMUNICATIONS
23 WORKERS OF AMERICA, AFL-CIO

PERRY, JOHNSON, ANDERSON,
MILLER & MOSKOWITZ LLP

1 MICHAEL G. MILLER, (SBN 136491)
2 SCOTT LEWIS, (SBN 149094)
3 HEATHER-ANN T. YOUNG (SBN 283211)
4 PERRY, JOHNSON, ANDERSON,
5 MILLER & MOSKOWITZ, LLP
6 438 1st Street, 4th Floor
7 Santa Rosa, California 95401
8 Telephone: (707) 525-8800
9 Facsimile: (707) 545-8242

6 Attorneys for Plaintiff

7 UNITED STATES DISTRICT COURT
8 NORTHERN DISTRICT OF CALIFORNIA

9 SARA McENROE,

Case No. C-14-03461 HSG

10 Plaintiff,

11 v.

12 LOCAL 9400, COMMUNICATIONS
13 WORKERS OF AMERICA, AFL-CIO, a
14 Labor Organization; DISTRICT 9,
15 COMMUNICATIONS WORKERS OF
16 AMERICA, AFL-CIO, a Labor
17 organization; COMMUNICATIONS
18 WORKERS OF AMERICA, AFL-CIO, a
19 Labor Organization; and DOES 1 through
20 20, inclusive,

~~PROPOSED ORDER~~

17 Defendants.

ORDER

21 IT IS HEREBY ORDERED, pursuant to the above stipulation that the Court will
22 allow the deposition of Tom Runnion to take place on November 17, 2015 which is after the
23 date set for non-expert discovery cut-off set forth in Judge White's Order Scheduling Trial and
24 Pretrial Matters filed on December 15, 2015. This Order will not extend to any other deadlines
25 set forth in Judge White's Scheduling order.

25 IT IS SO ORDERED.

26 DATED: 11/2/2015


HON. HAYWOOD S. GILLIAM, JR.