

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CLARICE C. LIU (SBN 160555)
ccl@liuemploymentlaw.com
LIU EMPLOYMENT LAW FIRM
One Sansome Street, 35th Floor
San Francisco, CA 94104
Telephone: (415) 288-8622
Facsimile: (415) 288-8633

Attorneys for Plaintiff
GINGER MATSUMOTO-HERRERA

Camille A. Olson, SBN 111919
Richard B. Lapp, SBN 271052
Andrew R. Verriere, SBN 264274
SEYFARTH SHAW, LLP
560 Mission St., Suite 3100
San Francisco, CA 94105-2930
Telephone: (415) 397-2823
Facsimile: (415) 397-8549
E-Mail: colson@seyfarth.com
rlapp@seyfarth.com
ccarroll@seyfarth.com

Attorneys for Defendant
CONTINENTAL CASUALTY COMPANY

LIU EMPLOYMENT LAW FIRM
ONE SANSOME STREET, SUITE 3500
SAN FRANCISCO, CA 94104
(415) 288-8622

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

GINGER MATSUMOTO-HERRERA,

Plaintiff,

v.

CONTINENTAL CASUALTY COMPANY,
and DOES 1 through 100, inclusive,

Defendants.

CASE NO. 14-cv-03626-VC

**STIPULATION AND ~~PROPOSED~~
ORDER CONTINUING EXPERT
DISCOVERY CUTOFF DATE
RELATING TO EXPERT JAMES
STARK'S DEPOSITION**

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Whereas, the Court's current Order entered on May 15, 2015 sets the close of expert discovery for August 21, 2015 (Docket #27);

Whereas, due to the limited availability of expert witness Dr. James Stark, Plaintiff Ginger Matsumoto-Herrera and Defendant Continental Casualty Company (the "Parties") cannot obtain a mutually agreed upon date for the witness's deposition until August 31, 2015;

Whereas, the parties have agreed to continue the expert discovery deadline for only Dr. James Stark's deposition to August 31, 2015, and agree that they can do so without disturbing any other date or deadline in the Court's May 15, 2015 Order. Therefore, the Parties stipulate as follows:

STIPULATION

The Parties, by and through their counsel duly authorized, hereby stipulate to and request that the Court enter an Order continuing the expert discovery cutoff date relating only to Dr. James Stark's deposition until August 31, 2015.

Respectfully Submitted By,

DATED: August 10, 2015

LIU EMPLOYMENT LAW FIRM

By: 

CLARICE C. LIU
Attorney for Plaintiff GINGER MATSUMOTO-HERRERA

DATED: August 11, 2015

SEYFARTH SHAW

By: 

CAMILLE A. OLSON
RICHARD B. LAPP
ANDREW R. VERRIERE
Attorney for Defendant CONTINENTAL CASUALTY COMPANY

~~PROPOSED~~ ORDER

GOOD CAUSE APPEARING, the Stipulation of the Parties is hereby GRANTED. The May 15, 2015 Order is hereby modified continuing the expert discovery cutoff date relating to Dr. James Stark's deposition until August 31, 2015.

IT IS SO ORDERED.

Dated: August 11, 2015



The Hon. Vince Chhabria
Judge of the United States District Court

LIU EMPLOYMENT LAW FIRM
ONE SANSOME STREET, SUITE 3500
SAN FRANCISCO, CA 94104
(415) 288-8622

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28