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 16 TESORO REFINING & MARKETING COMPANY LLC

17 UNITED STATES DISTRICT COURT
 18 NORTHERN DISTRICT OF CALIFORNIA

19 JAREK BENSON,
 20 Plaintiff,
 21 v.
 22 TESORO REFINING & MARKETING
 23 COMPANY LLC; and DOES 1 through 50,
 Inclusive,
 24 Defendants.

Case No. 3:14-cv-05240 EMC
**STIPULATION AND ~~PROPOSED~~
 ORDER TO CONTINUE DEADLINE FOR
 DISCOVERY CUTOFF**

Judge: Hon. Edward M. Chen

1 Pursuant to Local Rules 6-2 and 7-12, it is hereby stipulated, by and between plaintiff Jarek
2 Benson (“Plaintiff”) and defendant Tesoro Refining and Marketing Co., LLC (“Defendant”)
3 (collectively the “Parties”) through their respective undersigned counsel as follows:

4 1. Non-expert discovery in this case is currently scheduled to close on January 21, 2016.

5 2. Good cause exists for a brief extension of the above deadline. The first Case
6 Management Conference in this matter was held on June 11, 2015. The Court issued a scheduling order
7 on June 12, 2015, setting a January 21, 2016 non-expert discovery cutoff. Prior to and after the initial
8 Case Management Conference, the Parties have diligently conducted discovery, and have cooperated in
9 good faith on the scheduling of multiple depositions and written discovery in this matter.

10 3. A second Case Management Conference was held on November 24, 2015. The Court
11 directed the Parties to meet and confer regarding further alternative dispute resolution. On December 1,
12 2015, the Parties filed a joint status report confirming their agreement to participate in private mediation
13 (Doc. 34.)

14 4. The Parties attended mediation on January 5, 2016, before mediator Cynthia Remmers.
15 The Parties’ post-mediation settlement discussions with mediator Cynthia Remmers are continuing.

16 5. A brief, three-week extension of the current discovery cutoff would assist the Parties in
17 further settlement discussions, and would assist the Parties’ in their cooperative efforts to date to
18 complete discovery.

19 6. Plaintiff and Defendant have met and conferred and have stipulated to request a brief
20 extension of the deadline for Plaintiff and Defendant to complete non-expert discovery to **February 12,**
21 **2016.**

22 7. No prior continuances or extensions of the January 21, 2016 discovery cutoff set in the
23 Court’s initial Case Scheduling Order have been sought by either party.

24 8. The requested extension will have no impact upon the remaining case deadlines.

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