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16	Attorneys for Defendant TESORO REFINING & MARKETING COMPANY LLC		
17	UNITED STATES DISTRICT COURT		
18	NORTHERN DISTRICT OF CALIFORNIA		
19	JAREK BENSON,	Case No. 3:14-cv-05240 EMC	
20	Plaintiff,	STIPULATION AND [PROPOSED] ORDER TO CONTINUE DEADLINE FOR DISCOVERY CUTOFF	
21	v.		
22	TESORO REFINING & MARKETING	Judge: Hon. Edward M. Chen	
23	COMPANY LLC; and DOES 1 through 50, Inclusive,		
24	Defendants.		
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STIPULATION AND [PROPOSED] ORDER TO CONTINUE DISCOVERY CUTOFF DEADLINE CASE NO. 3:14-CV-05240

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

- 1. Non-expert discovery in this case is currently scheduled to close on January 21, 2016.
- 2. Good cause exists for a brief extension of the above deadline. The first Case Management Conference in this matter was held on June 11, 2015. The Court issued a scheduling order on June 12, 2015, setting a January 21, 2016 non-expert discovery cutoff. Prior to and after the initial Case Management Conference, the Parties have diligently conducted discovery, and have cooperated in good faith on the scheduling of multiple depositions and written discovery in this matter.
- 3. A second Case Management Conference was held on November 24, 2015. The Court directed the Parties to meet and confer regarding further alternative dispute resolution. On December 1, 2015, the Parties filed a joint status report confirming their agreement to participate in private mediation (Doc. 34.)
- 4. The Parties attended mediation on January 5, 2016, before mediator Cynthia Remmers.

 The Parties' post-mediation settlement discussions with mediator Cynthia Remmers are continuing.
- 5. A brief, three-week extension of the current discovery cutoff would assist the Parties in further settlement discussions, and would assist the Parties' in their cooperative efforts to date to complete discovery.
- 6. Plaintiff and Defendant have met and conferred and have stipulated to request a brief extension of the deadline for Plaintiff and Defendant to complete non-expert discovery to **February 12**, **2016**.
- 7. No prior continuances or extensions of the January 21, 2016 discovery cutoff set in the Court's initial Case Scheduling Order have been sought by either party.
 - 8. The requested extension will have no impact upon the remaining case deadlines.

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2	Respectfully submitted this 7th day of January, 2016.	
3	DATED: January 7, 2016	SEYFARTH SHAW LLP
4		
5		By: /s/ Michael W. Kopp William J. Dritsas
6		Emily E. Barker Michael W. Kopp
7		Attorneys for Defendant TESORO REFINING & MARKETING COMPANY LLC
8	DATED: January 7, 2016	LAW OFFICES OF RANDAL M. BARNUM
9		By: Danabel. Barner
10		Randal M. Barnum Carrie E. Croxall
11		Attorneys for Plaintiff JAREK BENSON
12		Attorney for Plaintiff agreed with the contents of this document
13		and authorized the filer to use his electronic signature.
14	[PROPOSED] ORDER CONTINUING THE NON-EXPERT DISCOVERY CUTOFF	
15	PURSUANT TO STIPULATION, IT IS SO ORDERED:	
16	The deadline for the Parties to complete all non-expert discovery is continued to February 12 ,	
17	2016.	ES DISTRICE
18 19	January 11, 2016	OST ATES DISTRICT CO.
20	Dated:	Judge D IT IS SO ORDERED
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22	Judge Edward M. Chen	
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24		
25		DISTRICT OF CE
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