1	Joseph E. Wiley (State Bar No. 84154) Joan Pugh Newman (State Bar No. 148562)		
2	WILEY PRICE & RADULOVICH, LLP 1301 Marina Village Parkway, Suite 310		
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5	Attorneys for Defendant CNH INDUSTRIAL AMERICA LLC		
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8	UNITED STATES DISTRICT COURT		
9	NORTHERN DISTRICT OF CALIFORNIA		
10			
11	CARLOS BATRES,	Case No.: 3:15-cv-01051-MMC	
12	Plaintiff,	STIPULATION AND [PROPOSED]	
13	v.	ORDER FOR EXTENSION OF EXPERT DISCOVERY CUT-OFF DATE	
14	CNH AMERICA LLC; and Does 1 to 20,		
15	inclusive,		
16	Defendants.		
17			
18	TO THE CLERK OF THE UNITED STATES DISTRICT COURT FOR THE		
19	NORTHERN DISTRICT OF CALIFORNIA, AND TO ALL PARTIES AND THEIR		
20	COUNSEL OF RECORD HEREIN:		
21	Plaintiff Carlos Batres ("Plaintiff"), and Defendant CNH Industrial America, LLC		
22	("Defendant"), by and through their respective counsel of record, hereby stipulate as follows:		
23	WHEREAS, pursuant to Court order, the expert discovery cut-off date in this matter is		
24	set for November 27, 2015;		
25	WHEREAS, because of conflicting schedules of the parties' experts and counsel, the		
26	parties are unable to take expert depositions until December; and		
27	WHEREAS, the parties have conferred and arrived at a mutually agreeable date to extend		
28	the expert discovery cut-off which will enable both sides to depose the opposing expert.		
Wiley Price & Radulovich, LLP	Stipulation and [Proposed] Order for Extension of Expert Discovery Cut-Off Date	Case No. 3:15-cv-01051-MMC	

-10	Based on the foregoing the par	arties hereby stimulate to extend the expert discovery cut-off		
1	Based on the foregoing, the parties hereby stipulate to extend the expert discovery cut-off date to, and through, December 15, 2015.			
2	IT IS SO STIPULATED.	013.		
3	II IS SO STIT CLATED.			
4	Date: November <u>18</u> 2015			
5		D.		
6		By: ENNETH C. ABSALOM		
7		GEORGE R. NEMIROFF Attorneys for Plaintiff CARLOS BATRES		
8		CARLOS BATRES		
9	Date: November, 2015	WILEY PRICE & RADULOVICH, LLP		
10				
11		By: JOSEPH E. WILEY		
12		JOAN PUGH NEWMAN		
13		Attorneys for Defendant CNH INDUSTRIAL AMERICA LLC		
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Case No. 3:15-cv-01051-MMC

Wiley Price & Stipulation and [Proposed] Order for Extension of Expert Discovery Cut-Off Date

1	Based on the foregoing, the parties hereby stipulate to extend the	e expert discovery cut-off		
2	date to, and through, December 15, 2015.			
3	3 IT IS SO STIPULATED.			
4		CTILO ADCALOM		
5	Date: November, 2015 LAW OFFICE OF KENNI	ETH C. ABSALOM		
6	By:	DCALOM		
7	KENNETH C. ABSALOM GEORGE R. NEMIROFF Attorneys for Plaintiff			
8	8 CARLOS BA	TRES		
9	Date: November 13 2015 WILEY PRICE & RAD	HLOVICH LLP		
10		Ann ar ar		
11	By: OFFICE I SUPPLIED IN STATE OF THE BOX OF	KUINOV VILEY		
12	\ \			
13	13 Attorneys for D CNH INDUSTRIAL A	efendant MERICA LLC		
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,		ase No. 3:15-cv-01051-MMC		

ORDER The parties having stipulated, and good cause appearing, the expert discovery cut-off date is extended until, and through, December 15, 2015. No other Court-ordered dates in this matter are affected. IT IS SO ORDERED. Dated: <u>November 19</u>, 2015

Wiley Price & Radulovich, LLP