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8 Attorneys for Defendant  
 9 CNH INDUSTRIAL AMERICA LLC

10 UNITED STATES DISTRICT COURT  
 11 NORTHERN DISTRICT OF CALIFORNIA

12 CARLOS BATRES,

13 Plaintiff,

14 v.

15 CNH AMERICA LLC; and Does 1 to 20,  
 16 inclusive,

17 Defendants.

Case No.: 3:15-cv-01051-MMC

**STIPULATION AND ~~PROPOSED~~  
 ORDER FOR EXTENSION OF EXPERT  
 DISCOVERY CUT-OFF DATE**

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.

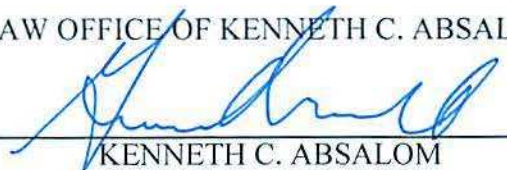
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Based on the foregoing, the parties hereby stipulate to extend the expert discovery cut-off date to, and through, December 15, 2015.

**IT IS SO STIPULATED.**

Date: November 18 2015

LAW OFFICE OF KENNETH C. ABSALOM

By:   
KENNETH C. ABSALOM  
GEORGE R. NEMIROFF  
Attorneys for Plaintiff  
CARLOS BATRES

Date: November \_\_, 2015

WILEY PRICE & RADULOVICH, LLP

By: \_\_\_\_\_  
JOSEPH E. WILEY  
JOAN PUGH NEWMAN  
Attorneys for Defendant  
CNH INDUSTRIAL AMERICA LLC

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**IT IS SO STIPULATED.**

Date: November \_\_, 2015

LAW OFFICE OF KENNETH C. ABSALOM

By: \_\_\_\_\_

KENNETH C. ABSALOM  
GEORGE R. NEMIROFF  
Attorneys for Plaintiff  
CARLOS BATRES

Date: November 13, 2015

WILEY PRICE & RADULOVICH, LLP

By: \_\_\_\_\_

  
JOSEPH E. WILEY  
JOAN PUGH NEWMAN

Attorneys for Defendant  
CNH INDUSTRIAL AMERICA LLC

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**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: November 19, 2015

  
\_\_\_\_\_  
HON. MAXINE M. CHESNEY  
UNITED STATES DISTRICT COURT JUDGE