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22 **Attorneys for Defendant**
 23 **MARRIOTT HOTEL SERVICES, INC.**

24 **UNITED STATE DISTRICT COURT**
 25 **NORTHERN DISTRICT OF CALIFORNIA**

26 **AZIZ MOGADDEDI,**
 27 **Plaintiff,**
 28 **v.**
 29 **MARRIOTT INTERNATIONAL, INC.;**
 30 **and DOES 1-100, inclusive,**
 31 **Defendants.**

Case No.: 3:15-cv-02563-LB

**JOINT STIPULATION AND REQUEST
 TO CONTINUE (1) NON-EXPERT
 DISCOVERY COMPLETION DATE
 AND (2) LAST HEARING DATE FOR
 DISPOSITIVE MOTIONS; ~~PROPOSED~~
 ORDER**

The Hon. Laurel Beeler

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1 The parties to the above-entitled action hereby respectfully submit this Joint Stipulation and
2 Request to Continue (1) the Non-Expert Discovery Completion Date, from August 29, 2016, to
3 October 10, 2016; and (2) the last hearing date for dispositive motions, from October 13, 2016, to
4 December 1, 2016. The parties had refrained from conducting extensive discovery in anticipation
5 of a recent, ultimately unsuccessful, settlement conference on June 17, 2016, and are currently in
6 the process of meeting and conferring regarding discovery responses.

7 **JOINT STIPULATION AND REQUEST TO CONTINUE**

8 WHEREAS, the parties had refrained from conducting extensive discovery in anticipation
9 of a court-sponsored mediation on November 24, 2016, and a settlement conference on June 17,
10 2016;

11 WHEREAS, the parties are currently in the process of meeting and conferring regarding
12 discovery responses;

13 WHEREAS, Plaintiff is waiting for the conclusion of the meet and confer process before
14 setting depositions;

15 WHEREAS, the parties have recently agreed upon a mutual convenient date for the
16 deposition of Plaintiff, August 25, 2016;

17 WHEREAS, parties request that the Court continue (1) the Non-Expert Discovery
18 Completion Date, from August 29, 2016, to October 10, 2016; and (2) the last hearing date for
19 dispositive motions, from October 13, 2016, to December 1, 2016. This stipulation does not alter
20 the date of any other event or deadline already fixed by Court order.

21
22 **DATED:** August 10, 2016

MAYALL HURLEY P.C.

23
24 By _____ /s/ Nicholas J. Scardigli
25 NICHOLAS J. SCARDIGLI
26 VLADIMIR J. KOZINA
27 Attorneys for Plaintiff
AZIZ MOGADDEDI

1 **DATED:** August 10, 2016

PAYNE & FEARS LLP

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3 By /s/ Leila Narvid
4 LEILA NARVID
5 Attorneys for Defendant
6 MARRIOTT INTERNATIONAL, INC.
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1 ~~PROPOSED~~ ORDER

2 Pursuant to the Joint Stipulation by the parties, and GOOD CAUSE APPEARING
3 THEREFORE,

4 **IT IS HEREBY ORDERED** that (1) the Non-Expert Discovery Completion Date, from
5 August 29, 2016, to October 10, 2016; and (2) the last hearing date for dispositive motions, from
6 October 13, 2016, to December 1, 2016.

7
8 **DATED:** August 10, 2016

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10 _____
11 Hon. Laurel Beeler
12 U.S. Magistrate Judge