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14	UNITED STATES DISTRICT COURT		
15	NORTHERN DISTRICT OF CALIFORNIA		
16	SAN FRANCISCO DIVISION		
17	FAITH BAUTISTA, Individually and on	Case No. 3:15-CV-05557-RS	
18	Behalf of All Others Similarly Situated,	ORDER STIPULATED REQUEST FOR ORDER	
19	Plaintiff,	CHANGING CERTAIN DEADLINES IN THE COURT'S FURTHER CASE MANAGEMENT	
20	v.	SCHEDULING ORDER	
21	VALERO MARKETING AND SUPPLY COMPANY,	Accompanying Documents:	
22		1. Declaration of Christopher C. Gold	
23	Defendant.		
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25			
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		Dockets.Justia.com	

1	Pursuant to L.R. 6-2, Plaintiff Faith Bautista ("Plaintiff") and Defendant Valero Marketing	
2	and Fuel Supply ("Valero") respectfully submit this stipulated request for an Order changing certain	
3	deadlines in the Court's Further Case Management Scheduling Order (ECF No. 128, the "Order").	
4	During the Case Management Conference on November 9, 2017, the Court urged the parties	
5	to make an attempt at alternative dispute resolution well before the August 4, 2018 deadline set in	
6	the Order. The parties thereafter began mediation discussions, and, on December 4, 2017, the parties	
7	filed a supplemental case management report, ECF No. 129, to advise the Court that, in light of the	
8	ongoing mediation discussions, the parties intended to hold class notice in abeyance pending	
9	mediation (although the Order did not set a class notice deadline).	
10	The parties ultimately scheduled private mediation to be held on February 28, 2018. If the	
11	mediation is successful in resolving this case, it will become unnecessary for the parties to conduct	
12	expert discovery, as provided in the Order. To meet the current expert witness deadlines in the	
13	Order, however, the parties would have to begin expending resources on expert discovery	
14	immediately. Thus, in order to conserve the resources of the parties and the certified Class, the	
15	parties respectfully request that the expert witness deadlines in the Order be changed as follows:	
16	• On or before May 22, 2018, parties will designate experts in accordance with	
17	Federal Rule of Civil Procedure 26(a)(2).	
18	• On or before June 22, 2018, parties will designate their supplemental and rebuttal	
19	experts in accordance with Federal Rule of Civil Procedure 26(a)(2).	
20	• On or before July 30, 2018, all discovery of expert witnesses pursuant to Federal	
21	Rule of Civil Procedure 26(b)(4) shall be completed.	
22	Because the aforementioned modifications could impact any pretrial motions that may be	
23	filed if mediation is unsuccessful, the parties further respectfully request that the last day for hearing	
24	on pretrial motions in the Order be changed from June 14, 2018 to August $13, 2018$ (provided that	
25	the parties remain free to bring motions for hearing sooner than August 1% , 2018).	
26	The parties do not believe that the requested modifications will affect the other dates set in	
27	the Order.	
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1	SO STIPULATED.	
2	Dated: January 16, 2018	ROBBINS GELLER RUDMAN
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8	By:	/s/ Christopher C. Gold Christopher C. Gold
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14	Dated: January 16, 2018	GLYNN & FINLEY, LLP ADAM FRIEDENBERG
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	By:	/s/ Adam Friedenberg
20		Adam Friedenberg
21		Attorneys for Defendant
22	DUDGUANT TO STIDULATION IT IS SA	ODDEDED
23	PURSUANT TO STIPULATION, IT IS S	
24	DATED: <u>1/16/18</u>	hihr Section
25		Richard Seeborg United States District Court Judge
26		Onica States District Court Judge
27		
28 1351412_1	STIPULATED REQUEST FOR ORDER CHANGING CERTAIN DEADLINES IN THE COURT'S FURTHER CASE MANAGEMENT SCHEDULING ORDER – Case No. 3:15-CV-05557-RS - 3	