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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

JENNIFER LASSALLE; EMILY ANNE
LASSALLE; MADELINE ELIZABETH
LASSALLE, a minor and GRACE
CAROLINE LASSALLE, a minor by and
through their Guardian ad Litem ADOLPH
ADRAGNA, JR.

Plaintiffs,

v.

MCNEILUS TRUCK AND
MANUFACTURING, INC., AUTOCAR,
LLC; and Does 1 to 200, inclusive,

Defendants,

Case No. 3:16-cv-00766-WHO

**STIPULATION AND ORDER TO
EXTEND SCHEDULING ORDER
DEADLINES**

Date: March 29, 2017
Time: 2:00 p.m.
Courtroom: 2- 17th Floor
Hon.: William H. Orrick

Courtroom: A-15th Floor

Action Filed: September 16, 2015
Action Removed: February 17, 2016

Subject to the approval of this Court, the parties hereby stipulate to extend the current deadlines as follows:

Fact Discovery cutoff:	March 31, 2017
Expert Disclosure:	April 10, 2017
Expert Rebuttal:	April 20, 2017
Expert Discovery cutoff:	May 20, 2017
Dispositive motion heard by:	July 2, 2017
Trial:	September 5, 2017 (no change)

The parties make this request because the parties need additional time to complete witness depositions. Over 20 Fact depositions have been taken but some witnesses have not been cooperative and additional time has been needed to get their depositions. There are approximately 5 of those. Those depositions need to be completed and provided to the experts.

All sides have pursued discovery cooperatively and diligently and continue to do so with approximately 5 depositions noticed to proceed over the next 2 weeks. The parties have worked together to notice and schedule depositions and have been faced with an inordinate amount of difficulty in serving deponents and securing necessary testimony. Compounding the issues of deponent delays, the experts have not been given the opportunity to evaluate the testimony and prepare their reports, and defendant McNeilus has been delayed in the evaluation of the need and propriety of a motion for summary judgment.

The parties met and conferred and agreed that the extension of time listed above is necessary. Premised upon these facts, and the diligence of the parties working jointly, the parties request that deadlines be continued as follows:

Fact Discovery cutoff:	March 31, 2017
Expert Disclosure:	April 10, 2017
Expert Rebuttal:	April 20, 2017
Expert Discovery cutoff:	May 20, 2017
Dispositive motion heard by:	July 5, 2017
Trial:	September 5, 2017 (no change)

The parties have conferred and jointly agree to this extension.

SO STIPULATED:

Date: March 9, 2017

Matthew D. Haley, Esq.
Attorney for Plaintiff

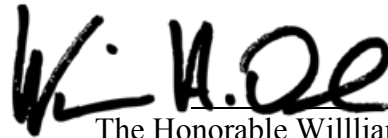
SO STIPULATED:

Date:

Elizabeth V. McNulty, Esq.
Attorney for Defendant

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Date: March 27, 2017

A handwritten signature in black ink, appearing to read "W. H. Orrick", is written over a horizontal line.

The Honorable William H. Orrick
Judge of the District Court