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Attorneys for Defendant
 HOOVESTOL, INC.

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

RICHARD TERRY, on behalf of himself
 and all others similarly situated, and on
 behalf of the general public

Plaintiff,

v.

HOOVESTOL, INC., and DOES 1-100

Defendants.

Case No. 3:16-cv-5183

*[Assigned for all purposes to the Honorable Jon
 S. Tigar]*

**STIPULATION AND ~~PROPOSED~~ ORDER
 EXTENDING THE PARTIES' CLASS
 CERTIFICATION RELATED EXPERT
 DISCOVERY CUT-OFF BY TWENTY-ONE
 (21) DAYS**

Complaint Filed: July 20, 2016
 Removed: September 8, 2016
 Trial Date: None Set

1 Plaintiff RICHARD TERRY (“Plaintiff”) and Defendant HOOVESTOL, INC.
2 (“Defendant”) (collectively “the Parties”), by and through their respective counsel, hereby jointly
3 submit this Stipulation and [Proposed] Order Extending the Parties’ Class-Certification Related
4 Expert Discovery Cut-Off by Twenty-One (21) Days, solely to complete the deposition of
5 plaintiff’s expert, Kevin Taylor.

6 WHEREAS, the Court issued a Scheduling Order on December 21, 2016 setting the
7 Parties’ class certification related expert discovery cut-off on December 29, 2017;

8 WHEREAS, per the Court’s December 21, 2016 Scheduling Order, the Parties exchanged
9 their class-certification related expert disclosures on November 10, 2017;

10 WHEREAS, per the Court’s December 21, 2016 Scheduling Order, the Parties exchanged
11 their class-certification related rebuttals on December 8, 2017;

12 WHEREAS, on December 8, 2017, Defendant noticed the deposition of Plaintiff’s expert,
13 Kevin Taylor, to take place on December 27, 2017 in Oakland, California;

14 WHEREAS, Mr. Taylor is out of town on December 27, 2017 and is not available until
15 January 8, 2018;

16 WHEREAS, the Parties have met and conferred regarding the date of Mr. Taylor’s
17 deposition and have agreed to conduct this deposition on a mutually agreeable date sometime
18 between January 8, 2018 and January 19, 2018, subject to the Court granting this stipulation, so
19 as to not interrupt Mr. Taylor’s vacation plans;

20 WHEREAS, extending the class-certification related discovery cut-off will not affect the
21 Parties’ class certification filing deadlines;

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1 NOW THEREFORE, it is stipulated by and between Plaintiff and Defendant that the class-
2 certification related expert discovery cut-off be continued by twenty-one (21) days from
3 December 29, 2017 to January 19, 2018, solely to complete the deposition of plaintiff' s expert,
4 Kevin Taylor, subject to the Court' s approval.

5
6 Dated: December 18, 2017

THE TURLEY & MARA LAW FIRM, APLC

7 /s/ Jill Vecchi

8 William Turley, Esq.

9 David Mara, Esq.

Jill Vecchi, Esq.

10 Representing Plaintiff RICHARD TERRY on
11 behalf of himself and all others similarly situated,
12 and on behalf of the general public

13 Dated: December 18, 2017

BURNHAM BROWN

14 /s/ Raymond Greene (authorized on 12/18/17)

15 Cathy L. Arias, Esq.

16 Raymond A. Greene, III, Esq.

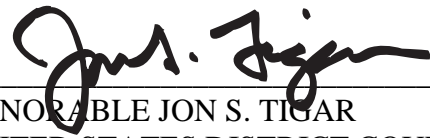
17 Representing Defendant HOOVESTOL, INC.

~~PROPOSED~~ ORDER

1 Based upon the stipulation of the parties, and good cause having been shown, the Court
2 hereby continues the Parties' class-certification related expert discovery cut-off by twenty-one
3 (21) days from December 29, 2017 to January 19, 2018, solely to complete the deposition of
4 plaintiff's expert, Kevin Taylor. All other dates in the Court's December 21, 2016 Scheduling
5 Order remain the same.

6
7 IT IS SO ORDERED.

8 Dated: December 18, 2017



HONORABLE JON S. TIGAR
UNITED STATES DISTRICT COURT