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16 **UNITED STATES DISTRICT COURT**
 17 **NORTHERN DISTRICT OF CALIFORNIA**
 18

19	JOYCE BENTON,)	Case No. 3:16-CV-06583-MMC
20	Plaintiff,)	STIPULATION and PROPOSED ORDER RE DEADLINES AND BRIEFING SCHEDULE
21	v.)	
22	CLARITY SERVICES, INC., and DOES 1)	
23	through 50, inclusive,)	Hon. Maxine M. Chesney
24	Defendants.)	
25)	
26)	
27)	
28)	

1 Plaintiff Joyce Benton (“Plaintiff”) and Defendant Clarity Services, Inc. (“Clarity”)
2 (collectively, “the Parties”) hereby stipulate to the following:

3 WHEREAS, following an initial case management conference, the Court issued a
4 scheduling order on March 31, 2017 (ECF Doc. No. 51); and

5 WHEREAS, since the Order was issued, the Parties have been actively engaged in
6 discovery and motion practice in this matter and the related case pending in the Alameda County
7 Superior Court (Hon. Brad Seligman presiding); and

8 WHEREAS, the Parties have agreed to mediate this case on October 16, 2017 before the
9 Hon. John Leo Wagner (Ret.); and

10 WHEREAS, the Parties are finalizing the deposition dates for Plaintiff and for Clarity’s
11 corporate designee pursuant to Fed. R. Civ. Proc. 30(b)(6); and

12 WHEREAS, the Parties believe an adjustment to the Order is warranted to allow for the
13 completion of mediation and depositions;

14 THEREFORE, THE PARTIES RESPECTFULLY REQUEST that the current schedule
15 be modified to the following:

16 **BRIEFING SCHEDULE - SUMMARY JUDGMENT:**

17 Discovery cutoff (Phase One): November 24, 2017

18 Expert Disclosure: October 13, 2017

19 Rebuttal Expert Disclosure: October 27, 2017

20 Expert Discovery Cutoff: December 8, 2017

21 Motion for Summary Judgment filing deadline: December 15, 2017

22 Opposition due: January 12, 2018.

23 Reply due: January 22, 2018.

24 Summary Judgment Motion Hearing: February 16, 2018 at 9:00 AM.

25 A Proposed Order incorporating the above relief is attached and submitted herewith.

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27 Dated: August 23, 2017

CHAVEZ & GERTLER LLP

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/s/ Christian Schreiber
Christian Schreiber
Attorneys for Plaintiffs

Dated: August 25, 2017

TROUTMAN SANDERS LLP

By: /s/ Ronald Raether
Ronald I. Raether
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PROPOSED ORDER

Having read the stipulation of the Parties, and good cause appearing therefor, the Court hereby Orders the following briefing schedule:

Discovery cutoff (Phase One): November 24, 2017

Expert Disclosure: October 13, 2017

Rebuttal Expert Disclosure: October 27, 2017

Expert Discovery Cutoff: December 8, 2017

Motion for Summary Judgment filing deadline: December 15, 2017

Opposition due: January 12, 2018.

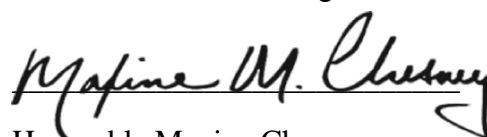
Reply due: January 22, 2018.

Summary Judgment Motion Hearing: February 16, 2018 at 9:00 AM.

~~All other dates previously scheduled by the Court will remain in effect.~~

IT IS SO ORDERED. IT IS FURTHER ORDERED that the Further Case Management Conference is continued to April 13, 2018; a Joint Case Management Statement shall be filed no later than April 6, 2018.

Dated: August 25, 2017



Honorable Maxine Chesney
United States District Court Judge