Ramkissoon v. AOL	LC L	Doc.	229
	Joseph J. Tabacco, Jr. (No. 75484)		
1	Christopher T. Heffelfinger (No. 118058)		
2	BERMAN DeVALERIO One California Street, Suite 900		
3	San Francisco, California 94111 Telephone: (415) 433-3200		
4	Facsimile: (415) 433-6382		
5	Manuel J. Dominguez (<i>Pro Hac Vice</i>)		
6	BERMAN DeVALERIO 4280 Professional Center Drive, Suite 350		
7	Palm Beach Gardens, FL 33410		
8	Telephone: (561) 835-9400 Facsimile: (561) 835-0322		
9	Attorneys for Plaintiffs and the Class		
10			
11	UNITED STATES DISTRICT COURT		
12	NORTHERN DISTRICT OF CALIFORNIA		
13	OAKLAND DIVISION		
14	DOE 1, DOE 2, and KASADORE RAMKISSOON, on Behalf of) CASE NO. C 06-5866 SBA	
15	Themselves and all other Persons)) , , , , , , , , , , , , , , , , , ,	
16	Similarly Situated, Plaintiffs,	Honorable Saundra Brown Armstrong	
17	v.	JOINT STIPULATION and ORDER FOR EXTENSION OF EXPERT	
18) DISCOVERY	
19	AOL LLC,		
20	Defendant.		
21			
22			
23			
24			
25			
26			
27	[C 06-5866 SBA]		
28	JOINT STIPULATION and [PROPOSED] ORDER FOR		
	EXTENSION OF EXPERT DISCOVERY		
		Dockets.Justia.	com

1

2

3

4

5

6

7

8

10

11

12

13

14 15

16

17

18

19

20

21 22

23

24

25

26

[C 06-5866 SBA] 27

RECITALS

WHEREAS Plaintiffs' deadline to designate experts is December 23, 2010, Defendant's deadline to designate experts is February 10, 2011, rebuttal disclosures are due on March 10, 2011, and the expert discovery deadline is March 24, 2011.

WHEREAS, subject to approval by the Court the parties have agreed to the modification of the expert discovery schedule which provides plaintiffs an additional 7 days until December 30, 2010 to designate experts, Defendant's deadline to designate experts is extended by 7 days until February 17, 2011, Plaintiffs will have an additional day to file their rebuttal report until March 11, 2011, and the expert discovery deadline will be extended by one day to March 25, 2011.

WHEREAS the requested time modification would not have any other effect on the schedule for the case.

WHEREAS Plaintiffs previously filed an unopposed motion to extend each of the expert discovery deadlines by twenty (20) days, which the Court granted on November 30, 2010.

IT IS THEREFORE STIPULATED by and between the parties, acting through their counsel of record, that, subject to the Court's approval, Plaintiffs' deadline to designate experts is extended by 7 days until December 30, 2011, Defendant's deadline to designate experts is extended by 7 days until February 17, 2011, Plaintiffs will have an additional day until March 11, 2011 to make rebuttal disclosures, and the expert discovery deadline will be extended by one day to March 25, 2011.

1		
2	SO STIPULATED	
3		
	Dated: December 28, 2010	
4		
5	/s/ Nathaniel L. Orenstein	/s/ Joseph Serino, Jr.
6	Joseph J. Tabacco, Jr. (75484)	•
7	Christopher T. Heffelfinger (118058) BERMAN DeVALERIO	Joseph Serino, Jr. Andrew G. Horne
8	One California Street, Suite 900 San Francisco, California 94104	Adam L. Fotiades David S. Flugman
9	Telephone: (415) 433-3200	All admitted pro hac vice KIRKLAND & ELLIS LLP
10	, ,	601 Lexington Avenue New York, New York 10022
11	Manuel J. Dominguez (<i>pro hac vice</i>) C. Oliver Burt, III	Telephone: (212) 446-4800 Facsimile: (212) 446-4900
12	BERMAN DeVALERIO 4280 Professional Center Drive, Suite 350	and
13	Palm Beach Gardens, Florida 33410 Telephone: (561) 835-9400	
14	Facsimile: (561) 835-0322	Elizabeth L. Deeley (230798) KIRKLAND & ELLIS LLP
	Nathaniel L. Orenstein (pro hac vice)	555 California Street San Francisco, California 94104
15	BERMAN DeVALERIO 1 Liberty Square	
16	Boston, Massachusetts 02109 Telephone: (617) 542-8300	Attorneys for Defendant
17	Facsimile: (617) 542-1194	
18	Richard R. Wiebe (121156) LAW OFFICE OF RICHARD R. WIEBE	
19	One California Street, Suite 900 San Francisco, California 94111	
20	Telephone: (415) 439-1400 Facsimile: (415) 439-1500	
21	James K. Green	
22	JAMES K. GREEN, P.A.	
23	222 Lakeview Avenue, Suite 1650 West Palm Beach, Florida 33401	
24	Attorneys for Plaintiffs	
25		
26		
27	[C 06-5866 SBA]	
	JOINT STIPULATION and [PROPOSED] ORDER FOR	
28	EXTENSION OF EXPERT DISCOVERY	

1	E-Filing Attestation		
2	I, Nathaniel L. Orenstein, am the ECF User whose ID and password are being used to file		
	this document. In compliance with General Order 45 X.B, I hereby attest that the signatory identified below concurred in its filing.		
3	/s/Nathaniel L. Orenstein		
4	Nathaniel L. Orenstein (Pro Hac Vice)		
5			
6	KIRKLAND & ELLIS LLP		
7	By: _/s/ Joseph Serino, Jr.		
8	Joseph Serino, Jr. (Pro Hac Vice)		
9	Joseph Serino, Jr.		
10	Andrew G. Horne David S. Flugman		
11	Adam Fotiades all admitted pro hac vice		
12	601 Lexington Avenue		
13	New York, New York 10022 Telephone: (212) 446-4800		
14	Facsimile: (212) 446-4900 Email: jserino@kirkland.com		
15	ahorne@kirkand.com dflugman@kirkland.com		
16	afotiades@kirkland.com		
17	Elizabeth L. Deeley 555 California Street		
18	San Francisco, California 94104 Telephone: (415) 439-1400		
19	Facsimile: (415) 439-1500 Email: edeeley@kirkland.com		
20	Attorneys for AOL LLC		
21			
22	ORDER		
23	PURSUANT TO STIPULATION, IT IS SO ORDERED.		
24	Dated: 12/27/10 Samula, B. Organian		
25	THE HONORABLE SAUNDRA BARMSTRONG UNITED STATES DISTRICT JUDGE		
26	OMILD SIMILS DISTRICT JUDGE		
20 27			
$\begin{bmatrix} 27 \\ 28 \end{bmatrix}$	[C 06-5866 SBA] JOINT STIPULATION and		
40	[PROPOSED] ORDER FOR EXTENSION OF EXPERT		
	DISCOVERY		