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

DEPARTMENT OF FAIR EMPLOYMENT
AND HOUSING, an agency of the State of
California,

Plaintiff,

and,

STEVEN J. CARAUDDO,

Plaintiff-Intervenor,

vs.

LUCENT TECHNOLOGIES, INC., and; DOES
ONE through THIRTY, Inclusive,

Defendants.

) Case No. C 07-3747 PJH
)
)
) **STIPULATION AND [PROPOSED]**
) **ORDER EXTENDING EXPERT**
) **DISCOVERY CUTOFF AS TO EXPERT**
) **MICHAEL ROBBINS**

STIPULATION

Defendant Lucent Technologies, Inc., plaintiff Department of Fair Employment and Housing
and plaintiff-intervenor Steven Carauddo, collectively referred to herein as "parties" jointly stipulate
as follows:



1 1. This Court's most recent order set forth the Non-expert and Expert Discovery Cutoff as
2 October 3, 2008.

3 2. While all other depositions will be completed by all parties on or before the current
4 Cutoff, the deposition of human resources expert Michael Robbins cannot practicably be completed
5 by that date given his need to review various fact witness depositions in order to update his Rule 26
6 report and be deposed. The parties agree that it would be beneficial to have a brief extension of the
7 above deadline as to this witness only.

8 3. Therefore, the parties request that this court set the following deadlines for the
9 supplemental report and deposition of Michael Robbins:

<u>Deadline</u>	<u>Proposed Extended Date</u>
Supplemental Rule 26 Report of Michael Robbins	October 21, 2008
Deposition of Michael Robbins	October 29, 2008

13 4. Defendant does not waive any objection to the content of any supplemental report by
14 this Stipulation.

15 **SO STIPULATED:**

16 Dated: September __, 2008

DEPARTMENT OF FAIR EMPLOYMENT
AND HOUSING

TIMOTHY M. MUSCAT
Chief Counsel

SUSAN SAYLOR
Senior Staff Counsel

22 By: /s/ Susan Saylor

23 _____
Susan Saylor
Attorneys for plaintiff, DFEH



1 Dated: September 23, 2008

BOXER & GERSON, LLP

4 By: /s/ Jean K. Hyams

5 Jean K. Hyams
6 Counsel for Steven Carauddo

7 Dated: September 23, 2008

8 EPSTEIN BECKER & GREEN, P.C.
9 STEVEN R. BLACKBURN
10 LESLIE J. MANN

11 By: /s/ Leslie J. Mann

12 Leslie J. Mann
13 Attorney for defendant
14 LUCENT TECHNOLOGIES INC.

15 **ORDER**

16 The following deadlines are set for the supplemental report and deposition of Michael

17 Robbins:

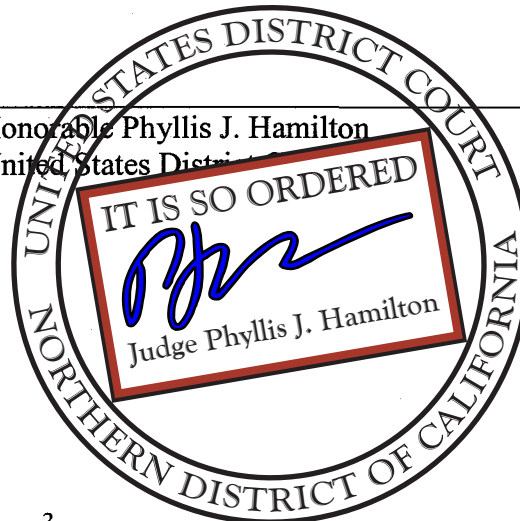
18 **Deadline**

19 Supplemental Rule 26 Report of Michael Robbins October 21, 2008

20 Deposition of Michael Robbins October 29, 2008

21 Dated: 9/24/08

22 Honorable Phyllis J. Hamilton
23 United States District Court



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