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10 UNITED STATES DISTRICT COURT
 11 NORTHERN DISTRICT OF CALIFORNIA

12 THERESA BUCKMAN- FALDUTI, an)
 13 individual; TODD FALDUTI, an individual,)
)
 14 Plaintiffs,)
)
 15 vs.)
)
 16 KINDERCARE LEARNING CENTERS,)
 17 INC., a Delaware corporation,)
)
 18 Defendant.)

Case No.: C 08-04778 CW

**STIPULATION AND ORDER TO
 EXTEND THE TIME FOR EXPERT
 DEPOSITIONS; MOTIONS TO COMPEL
 EXPERT DISCOVERY; AND HEARING
 ON MOTION FOR SUMMARY
 JUDGMENT; DECLARATION OF
 STEPHEN J. ESTEY IN SUPPORT
 THEREOF**

Judge: Hon. Claudia Wilkin
 Dept: Courtroom 2, 4th Floor

21 Pursuant to Local Rules 6-2 and 7-12, Defendant KINDERCARE LEARNING
 22 CENTERS, INC. (“KinderCare”) and Plaintiffs THERESA BUCKMAN-FALDUTI and TODD
 23 FALDUTI (collectively, the “Parties”) stipulate to extend:

- 24 (1) The time to complete the depositions of Todd Falduti and the following
 25 fact witnesses: Amber Bushaw, Susan Berry, and Dr. Juan Vargas from
 26 Wednesday, April 14, 2010 to Wednesday, July 14, 2010;
- 27 (2) The time to file and serve motions to compel fact discovery from Friday,
 28

- 1 April 23, 2010 to Wednesday, July 21, 2010;
- 2 (3) The time to complete retained and non-retained expert depositions from
- 3 Wednesday, April 14, 2010 to Wednesday, July 14, 2010;
- 4 (4) The time to file and serve motions to compel retained and non-retained
- 5 expert discovery from Friday, April 23, 2010 to Wednesday, July 21, 2010;
- 6 (5) The hearing date on defendant's Motion for Summary Judgment (and
- 7 related briefing deadlines) from Thursday, April 15, 2010 to Thursday, July
- 8 15, 2010; and
- 9 (6) The Case Management Conference from Thursday, April 15, 2010 to
- 10 Thursday, July 15, 2010.

11 for the reasons stated in the Declaration of Stephen J. Estey attached hereto as Exhibit "A".

12 The parties stipulate that it is not necessary to continue the November 9, 2010 Final

13 Pretrial Conference and the November 29, 2010 trial date at this time.

14 IT IS SO STIPULATED.

15 DATED: March 17, 2010 SEYFARTH SHAW LLP

16 By: /s/ Giovanna A. Ferrari

17 Jay W. Connolly

18 Giovanna A. Ferrari

19 Attorneys for Defendant

KINDERCARE LEARNING CENTERS, INC.

20 DATED: March 17, 2010 ESTEY & BOMBERGER, LLP

21 By: /s/ Stephen J. Estey

22 Stephen Estey

23 Michael Bomberger

24 Attorneys for Plaintiffs

THERESA BUCKMAN-FALDUTI AND

TODD FALDUTI

25 PURSUANT TO STIPULATION, IT IS SO ORDERED.

26 Dated: 3/25/10 _____

27 _____

28 
Hon. Judge Claudia Wilken