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8 IN THE UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
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12 FRANK SCHAFFNER,

13 Plaintiff,

14 v.

15 CROWN EQUIPMENT CORPORATION dba
16 CROWN LIFT TRUCKS,

17 Defendants.
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Case No. CV-09-00284 SBA

**STIPULATION AND ORDER
EXTENDING DISCOVERY DEADLINES**

19 Due to unforeseen circumstances, discovery scheduled to be completed in June 2011 has been
20 delayed until July 2011. In addition, Plaintiff's counsel will be unavailable for several weeks in late
21 August 2011 for paternity leave. The parties therefore stipulate to the following deadlines:

22 Fact discovery deadline of September 2, 2011 continued to October 21, 2011;

23 Disclosure of experts September 2, 2011 continued to October 21, 2011;

24 Disclosure of rebuttal experts 14 days thereafter;

25 Expert discovery completed by December 2, 2011.
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1 The parties respectfully request that the Court permit and grant the above extension of
2 deadlines to complete discovery.

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5 Dated: June ____, 2011

/s/ _____
Daniel R. Weltin, Esq.
WELTIN, STREB & WELTIN LLP
For Plaintiff Frank Schaffner

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9 Dated: June ____, 2011

/s/ _____
Kenneth E. Keller, Esq.
Michael D. Lisi, Esq.
KRIEG, KELLER, SLOAN, REILLEY & ROMAN LLP
For Defendant Crown Equipment Corp.

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15 Dated: June ____, 2011

/s/ _____
Christopher J. Nevis, Esq.
Nora M. Nachtsheim, Esq.
LEWIS BRISBOIS BISGAARD & SMITH, LLP
For Defendant Northwest Handling Systems, Inc.

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20 **ORDER**

21 Based upon the stipulation of the parties, and for good cause, it is so ordered..

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24 Dated: 8/1/11



Hon Saundra Brown Armstrong