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 MELISSA GREEN

7 UNITED STATE DISTRICT COURT  
 8 NORTHERN DISTRICT  
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<p>10 RUBY SODHI,</p> <p>11 Plaintiff,</p> <p>12 vs.</p> <p>13 COLLEGE OF THE REDWOODS AND          MELISSA GREEN,</p> <p>14 Defendant.</p>	<p>) Case No.: CV-09-1970 PJH</p> <p>)</p> <p>) <b>STIPULATION FOR EXTENSION OF</b></p> <p>) <b>DISCOVERY DEADLINE AS TO MATTERS</b></p> <p>) <b>SET FORTH BELOW</b></p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p>
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17 **IT IS HEREBY STIPULATED** by and between plaintiff RUBY SODHI and defendants  
 18 COLLEGE OF THE REDWOODS and MELISSA GREEN, through their respective undersigned  
 19 counsel, that the discovery deadline in this matter be extended from July 28, 2010 until October 8,  
 20 2010, but only for the purpose of conducting the limited discovery set forth below.

21 Good cause exists to continue the discovery deadline as follows:

22 Trial is scheduled for February 14, 2011. The discovery cut off is July 28, 2010. The parties  
 23 are scheduled to mediate the matter on August 9, 2010. Defendant is seeking to depose plaintiff's  
 24 treating mental health provider, which will require travel to Eureka, CA and cause the parties to incur  
 25 substantial fees and costs. The parties agree that it is in all parties' interest to defer this deposition  
 26 until after mediation, as said deposition may be unnecessary if the matter is resolved.

27 Defendant also seeks additional deposition time of plaintiff based in part on the recent  
 28 production of documents. Completion of this deposition will require travel to Eureka and cause the

1 parties to incur substantial fees and costs. The parties agree that it is in all parties' interest to defer  
2 this deposition until after mediation, as said deposition may be unnecessary if the matter is resolved.  
3 Plaintiff is agreeable to this arrangement subject to two limitations: 1) the deposition must be  
4 completed on the same day as plaintiff's mental health care provider is deposed; and 2) the deposition  
5 is limited in duration to two hours or less of deposition time.

6 The parties are seeking Court approval of this stipulation as it contemplates conducting  
7 discovery beyond the Court imposed discovery deadline of July 28, 2010.

8 It is therefore respectfully requested that the discovery deadline in this matter be extended  
9 from July 28, 2010 until October 8, 2010, but only for the purpose of completing plaintiff's  
10 deposition and the deposition of plaintiff's mental health provider.

11 The parties stipulate that a copy of a signature transmitted by any electronic means including,  
12 but not limited to, facsimile machine and scanned document transmitted via e-mail will have the same  
13 force and effect as an original signature.


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15 Dated: June 24, 2010

Dated: June 25, 2010

16 LAW OFFICES OF RICHARD M. ROGERS

BERTRAND, FOX & ELLIOT

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19 by: Richard M. Rogers  
Attorney for Plaintiff RUBY SODHI

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21 by: Michael C. Wenzel,  
22 Attorney for Defendants COLLEGE OF  
23 THE REDWOODS and MELISSA GREEN  
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**ORDER**

GOOD CAUSE APPEARING THEREFORE, the stipulation to extend the discovery deadline in this matter from July 28, 2010 until October 8, 2010 is GRANTED for the limited purpose of completing the deposition of plaintiff and taking the deposition of plaintiff's mental health care provider. The deposition of plaintiff shall take place on the same day plaintiff's mental health care provider is deposed and shall be limited to two hours of deposition time.

IT IS SO ORDERED.

DATED: 7/6/10

