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13	Attorneys for Plaintiff DREW KLAUSNER		
14	DREW KLAUSNER		
15	UNITED STATES	DISTRICT COURT	
16	NORTHERN DISTRICT OF CALIFORNIA		
17	OAKLAND DIVISION		
18			
19	DREW KLAUSNER;	Case No. CV 09-03502-CW	
20	Plaintiff,	STIPULATED REQUEST FOR ORDER	
21	v.	CHANGING EXPERT DISCOVERY DEADLINES & [PROPOSED] ORDER;	
22		DECLARATION OF NAKI M. IRVIN	
23	INDUSTRIAL LIGHT AND MAGIC, a division of LUCASFILM ENTERTAINMENT	[Civ. L.R. 6-2]	
24	COMPANY LTD. and DOES 1 through 25, inclusive,		
25		Action Filed: July 30, 2009	
26	Defendants.	Trial Date: April 11, 2011	
27			
28			
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601 Montgomery Street Suite 2030 San Francisco California 94111	STIPULATED REQUEST FOR ORDER CHANGING EXPERT DISCOVERY DEADLINES Case No. CV 09-03502-CW		
		Dockets.Justia.com	

1	STIPULATION OF THE PARTIES		
2	WHEREAS, pursuant to the Court's Case Management Order dated December 1, 2009		
3	(docket no. 21), the deadline to disclose the identities and reports of expert witnesses in this case is		
4	June 18, 2010, and the deadline to complete expert discovery is July 19, 2010;		
5	WHEREAS, the trial of this action is not scheduled to begin until April 11, 2011;		
6	WHEREAS, fact discovery is not scheduled to be completed until June 18, 2010;		
7	WHEREAS, the parties' expert witnesses cannot prepare complete reports of all their		
8	opinions in this matter until after they have had an opportunity to review fact discovery;		
9	WHEREAS, there have been no previous time modifications in this case;		
10	WHEREAS, continuing the expert discovery deadlines would not delay the trial date or		
11	otherwise affect the schedule for this case;		
12	THEREFORE, pursuant to Civil Local Rule 6-2, the parties to this action, by and through		
13	their counsel of record, do HEREBY STIPULATE AND REQUEST THE COURT TO ORDER as		
14	follows:		
15	(1) The deadline to disclose the identities and reports of expert witnesses is extended from		
16	June 18, 2010 to August 31, 2010; and		
17	(2) The deadline to complete expert discovery is extended from July 19, 2010 to October 1,		
18	2010.		
19	//		
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1	IT IS SO STIPULATED.	
2	DATED: May 19, 2010	MARGOLIS & TISMAN LLP
3		By: <u>/s/ Naki M. Irvin</u>
4		NAKI M. IRVIN
5		Attorneys for Defendant
6		INDUSTRIAL LIGHT AND MAGIC, a division of LUCASFILM ENTERTAINMENT
7		COMPANY LTD.
8	DATED: May 19, 2010	PIERCE & SHEARER LLP
9		By: /s/ Stacy North
10		STACY NORTH
11		Attorneys for Plaintiff DREW KLAUSNER
12		
13	[PROPOSED] ORDER	
14		
15	PURSUANT TO STIPULATION, IT IS SO ORDERED.	
16	(1) The deadline to disclose the identities and reports of expert witnesses is extended from	
17	June 18, 2010 to August 31, 2010; and	
18	(2) The deadline to complete expert discovery is extended from July 19, 2010 to October 1,	
19	2010.	
20	DATED: <u>5/27/2010</u>	Chidialett
21		HON. CLAUDIA WILKEN United States District Court Judge
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MARGOLIS & TISMAN LLP ATTORNEYS AT LAW 		\$
SUITE 2030 San Francisco California 94111	STIPULATED REQUEST FOR ORDER CHANGING EX	Printed on Recycled Paper PERT DISCOVERY DEADLINES Case No. CV 09-03502-CW

1	DECLARATION OF NAKI M. IRVIN			
2	I, Naki M. Irvin, declare as follows:			
3	1. I have personal knowledge of the facts set forth below.			
4	1. I am a partner with Margolis & Tisman LLP, which is counsel of record in this			
5	action for Defendant Industrial Light & Magic, a division of Lucasfilm Entertainment Company			
6	Ltd. ("Defendant"). Pursuant to Civil Local Rule 6-2(a), I am making this declaration to			
7	accompany the parties' stipulated request for an order changing the expert discovery deadlines in			
8	this case.			
9	2. The reason for the requested enlargement of time is that the expert witnesses cannot			
10	prepare complete reports of all their opinions in this matter until after they have had an opportunity			
11	to review fact discovery. Pursuant to the Court's December 1, 2009 Case Management Order			
12	(docket no. 21), fact discovery is not scheduled to be completed until June 18, 2010.			
13	3. There have been no prior time modifications in this case.			
14	4. The requested time modification will not delay the trial, which is not scheduled to			
15	begin until April 11, 2010, or otherwise affect the schedule for this case.			
16	I declare, under penalty of perjury, under the laws of the United States, that the foregoing is			
17	true and correct, and that this declaration was executed this 19th day of May, 2010, at San			
18	Francisco, California.			
19	<u>/s/ Naki M. Irvin</u> NAKI M. IRVIN			
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28 MARGOLIS & TISMAN LLP	3			
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