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21 Attorneys for Plaintiff  
22 DREW KLAUSNER

23 UNITED STATES DISTRICT COURT  
24 NORTHERN DISTRICT OF CALIFORNIA  
25 OAKLAND DIVISION

26 DREW KLAUSNER;

27 Plaintiff,

28 v.

INDUSTRIAL LIGHT AND MAGIC, a  
division of LUCASFILM ENTERTAINMENT  
COMPANY LTD. and DOES 1 through 25,  
inclusive,

Defendants.

Case No. CV 09-03502-CW

**STIPULATED REQUEST FOR ORDER  
CHANGING EXPERT DISCOVERY  
DEADLINES & [PROPOSED] ORDER;  
DECLARATION OF NAKI M. IRVIN**

**[Civ. L.R. 6-2]**

Action Filed: July 30, 2009  
Trial Date: April 11, 2011



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.

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IT IS SO STIPULATED.

DATED: May 19, 2010

MARGOLIS & TISMAN LLP

By: /s/ Naki M. Irvin  
NAKI M. IRVIN

Attorneys for Defendant  
INDUSTRIAL LIGHT AND MAGIC, a  
division of LUCASFILM ENTERTAINMENT  
COMPANY LTD.

DATED: May 19, 2010

PIERCE & SHEARER LLP

By: /s/ Stacy North  
STACY NORTH

Attorneys for Plaintiff  
DREW KLAUSNER

**PROPOSED ORDER**

PURSUANT TO STIPULATION, IT IS SO ORDERED.

(1) The deadline to disclose the identities and reports of expert witnesses is extended from  
June 18, 2010 to August 31, 2010; and

(2) The deadline to complete expert discovery is extended from July 19, 2010 to October 1,  
2010.

DATED: 5/27/2010



HON. CLAUDIA WILKEN  
United States District Court Judge

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