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14  
 15 **UNITED STATES DISTRICT COURT**  
 16 **NORTHERN DISTRICT OF CALIFORNIA**  
 17 **OAKLAND DIVISION**  
 18

19 DREW KLAUSNER;  
 20 Plaintiff,  
 21 v.

22  
 23 INDUSTRIAL LIGHT AND MAGIC, a  
 division of LUCASFILM ENTERTAINMENT  
 24 COMPANY LTD. and DOES 1 through 25,  
 inclusive,  
 25 Defendants.  
 26

Case No. CV 09-03502-CW

**STIPULATION EXTENDING DEADLINE  
 TO FILE MOTIONS TO COMPEL FACT  
 DISCOVERY & ORDER**

[Civ. L.R. 6-2, 37-2]

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



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1 **STIPULATION OF THE PARTIES**

2 WHEREAS, the deadline to complete fact discovery in this action was continued to July 31,  
3 2010, and the deadline to file motions to compel fact discovery is currently August 9, 2010,  
4 pursuant to Civil Local Rule 37-2 and Federal Rule of Civil Procedure 6;

5 WHEREAS, the Parties wish to have additional time to meet and confer about fact discovery  
6 in an attempt to informally resolve all issues between them without filing motions to compel;

7 THEREFORE, pursuant to Civil Local Rule 6-2, the Parties to this action, by and through  
8 their counsel of record, hereby stipulate and request the Court to order that the deadline to file any  
9 motions to compel fact discovery is extended to and including September 30, 2010.

10 IT IS SO STIPULATED.

11 DATED: August 5, 2010

MARGOLIS & TISMAN LLP

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

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

17 DATED: August 5, 2010

PIERCE & SHEARER LLP

18 By: /s/ Stacy Y. North  
19 STACY Y. NORTH  
20 Attorneys for Plaintiff  
DREW KLAUSNER

21 **ORDER**

22 PURSUANT TO STIPULATION, IT IS SO ORDERED.

23  
24 DATED: 8/12/2010

  
25 HON. CLAUDIA WILKEN  
26 United States District Court Judge  
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**DECLARATION OF NAKI M. IRVIN**

I, Naki M. Irvin, declare as follows:

1. I have personal knowledge of the facts set forth below.

2. I am a partner with Margolis & Tisman LLP, which is counsel of record in this action for Defendant Industrial Light & Magic, a division of Lucasfilm Entertainment Company Ltd. Pursuant to Civil Local Rule 6-2(a), I make this declaration to accompany the stipulated request to extend the deadline to move to compel fact discovery.

3. The reason for this stipulated request is that the Parties wish to have additional time to meet and confer about fact discovery in an attempt to informally resolve all issues between them without filing motions to compel.

4. The only previous time modifications in this case have been stipulated extensions of fact and expert discovery deadlines.

5. The requested time modification will not delay the trial, which is not scheduled to begin until April 11, 2010, or otherwise affect the schedule for this case.

I declare, under penalty of perjury, under the laws of the United States, that the foregoing is true and correct, and that this declaration was executed this 5th day of August, 2010, at San Francisco, California.

/s/ Naki M. Irvin  
NAKI M. IRVIN