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14 *Attorneys for Defendants Interstate Battery System of*
 15 *America, Inc., and Interstate Battery System International, Inc.*

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

19
 20 DENO MILANO,

21 Plaintiff,

22 vs.

23 INTERSTATE BATTERY SYSTEM OF
 24 AMERICA, INC.; INTERSTATE BATTERY
 SYSTEM INTERNATIONAL, INC.,

25 Defendants.
 26
 27
 28

Case No. C 10-02125 CW

**STIPULATION TO EXTEND DEADLINES
AND [PROPOSED] ORDER**

1 Plaintiff Deno Milano and Defendants Interstate Battery System of America, Inc., and Interstate
2 Battery System International, Inc., by and through the undersigned attorneys hereby agree and stipulate
3 as follows:

4 WHEREAS, the Court by Order dated February 15, 2011, previously approved a thirty-day
5 extension of all deadlines currently pending in this matter so that the parties could focus their efforts on
6 mediation;

7 WHEREAS, the parties had a mediation session with the Hon. William J. Cahill (Ret.) of JAMS,
8 on February 18, 2011;

9 WHEREAS, the parties agree that they made progress toward a potential class settlement, and
10 thus have scheduled a second mediation session with Judge Cahill for March 17, 2011; and

11 WHEREAS, because the parties wish to continue to devote their resources and energies to the
12 mediation and to resolving this litigation if possible, they therefore request to extend the stay from
13 March 10, 2011, through April 10, 2011, and for a thirty-day extension of all deadlines currently
14 pending in this matter.

15 **IT IS HEREBY STIPULATED AND AGREED**, by and through the undersigned attorneys for
16 the parties, subject to the Court's approval, that the stay in effect is extended from March 10, 2011,
17 through April 10, 2011, and all pending deadlines in this litigation are extended by another 30 days.

18 **IT IS SO STIPULATED**

19
20 DATED: March 8, 2011

GIRARD GIBBS LLP

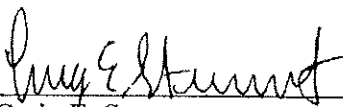
21 By: /s/ Eric H. Gibbs

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Attorneys for Plaintiff

1 DATED: March 1, 2011

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Attorneys for Defendants


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11 **PURSUANT TO STIPULATION, IT IS ORDERED:**

12 The Court has read and considered the parties' stipulation and orders that:

13 1. The case is stayed through April 10, 2011, and all pending deadlines in this litigation are
14 extended by another 30 days.

15 2. The Further Case Management Conference and the Motion Hearing for class certification
16 and any dispositive motion(s), currently set for June 16, 2011, at 2:00 pm., will be held instead on July
17 14, 2011, at 2:00 p.m.

18
19 Date: 3/9/2011

20 
21 Judge Claudia Wilken
22 United States District Judge