

1 DAVID EDLIN, an individual,
2 Defendants.

) **OBER AND TO TAKE THE**
) **DEPOSITIONS OF MARTIN COHEN,**
) **ROBERT STEERS, FRANK POLI AND**
) **SALVATORE RAPP**
)
)

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5 IT IS HEREBY STIPULATED, by and among Plaintiff JANET HALEY (“Plaintiff”),
6 Defendant COHEN & STEERS CAPITAL MANAGEMENT, INC. (“Cohen & Steers”) and
7 Defendant DAVID EDLIN (“Edlin”) (collectively the “Parties”), through their respective
8 undersigned counsel, as follows:

9 WHEREAS, the Parties have, given the recent non-expert discovery cutoff, engaged in
10 extensive motion practice in the preceding weeks, including (1) Plaintiff Janet Haley’s Motion
11 for Leave of Court to Take Additional Deposition Testimony from Terrance Ober and to Take
12 the Depositions of Martin Cohen, Robert Steers, Frank Poli, and Salvatore Rappa (“Motion for
13 Leave”) (filed January 10, 2012, Dkt. No. 141); (2) Plaintiff Janet Haley’s Motion for
14 Administrative Relief for Extension of the Non-Expert Discovery Cutoff for the Limited Purpose
15 of Completing the Deposition of Terrance Ober and Taking the Depositions of Martin Cohen,
16 Robert Steers, Frank Poli, and Salvatore Rappa (and associated Oppositions) (Dkt. Nos. 145,
17 148, 149); (3) Plaintiff’s Administrative Motion to File Under Seal (Dkt. No. 150); (4)
18 Defendants’ Motion to Compel Authorization for the Release of Plaintiff’s EDD Records (to be
19 filed on January 20, 2012); (5) Defendants’ Motion for Evidentiary and Monetary Sanctions with
20 Respect to Untimely Rule 26 Disclosures (to be filed on January 20, 2012); and (6) Plaintiff
21 Janet Haley’s Motion to Compel Responses to Requests for Production and Physical Production
22 of David Edlin’s Cellular Telephone (to be filed on January 20, 2012).

23 WHEREAS, Plaintiff’s deadline to file her Opposition to Defendant David Edlin’s
24 Motion for Summary Judgment was January 18, 2012 and Edlin’s deadline to file his Reply to
25 Plaintiff’s Opposition to Defendant David Edlin’s Motion for Summary Judgment is January 25,
26 2012;

27 WHEREAS, on Thursday, January 19, 2012, the Court entered a Clerk’s Notice resetting
28 the hearing on Plaintiff’s Motion for Leave from February 14, 2012 to March 20, 2012;

1 WHEREAS, the Parties are in agreement that all Parties have spent and will continue to
2 spend significant time on the above-mentioned motions and that no party will be prejudiced by
3 an enlargement of time for Defendants to file any Opposition to Plaintiff's Motion for Leave or
4 for Plaintiff to File any Reply to Defendants' Opposition;

5 IT IS HEREBY STIPULATED AND AGREED by and among the Parties, through their
6 respective undersigned counsel, that the filing deadlines for Defendants' Opposition and
7 Plaintiff's Reply shall be extended by two weeks, meaning Defendants' Opposition must be filed
8 on or before Tuesday, February 7, 2012, and Plaintiff's Reply must be filed on or before
9 Tuesday, February 14, 2012.

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11 IT IS SO STIPULATED.

12 DATED: January 20, 2012

SHEA LAW OFFICES

13 By: /s/ Mary Shea Hagebols
14 Mary Shea Hagebols
15 Attorney for Plaintiff
16 JANET HALEY

17 DATED: January 20, 2012

VAN DE POEL, LEVY & ALLEN LLP

18 By: /s/ Jeffrey W. Allen
19 Jeffrey W. Allen
20 Attorneys for Plaintiff
21 JANET HALEY

22 DATED: January 20, 2012

SEYFARTH SHAW LLP

23 By: /s/ Matthew J. Mason
24 Matthew J. Mason
25 Attorneys for Defendant
26 COHEN & STEERS CAPITAL
27 MANAGEMENT, INC.

28 DATED: January 20, 2012

AKIN GUMP STRAUSS HAUER & FELD
LLP

By: /s/ Damien P. Delaney
Damien P. Delaney
Attorney for Defendant
DAVID EDLIN

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~~PROPOSED~~ ORDER

The parties having so stipulated, and GOOD CAUSE APPEARING THEREFORE, IT IS
HEREBY ORDERED that:

The filing deadlines for Defendants' Opposition to Plaintiff Janet Haley's Motion for
Leave of Court to Take Additional Deposition Testimony from Terrance Ober and to Take the
Depositions of Martin Cohen, Robert Steers, Frank Poli, and Salvatore Rappa and Plaintiff's
Reply shall be extended by two weeks, meaning Defendants' Opposition must be filed on or
before Tuesday, February 7, 2012, and Plaintiff's Reply must be filed on or before Tuesday,
February 14, 2012.

IT IS SO ORDERED.

DATED: January 23, 2012


MAGISTRATE JUDGE ELIZABETH D. LAPORTE
UNITED STATES DISTRICT COURT