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6 Attorneys for Defendant  
 7 THE HERTZ CORPORATION

8  
 9 UNITED STATES DISTRICT COURT  
 10 NORTHERN DISTRICT OF CALIFORNIA  
 11 OAKLAND DIVISION

13 KATHLEEN M. LUCAS and DAN  
 MARTIN,  
 14  
 Plaintiffs,  
 15  
 v.  
 16 HERTZ CORPORATION and DOES 1-10,  
 17 inclusive,  
 18 Defendants.

Case No. 4:11-cv-01581 LB  
**STIPULATION TO MODIFY CASE  
 MANAGEMENT AND PRE-TRIAL  
 ORDER; ~~PROPOSED~~ ORDER**

19  
 20 WHEREAS all parties herein acted, and continue to act, diligently in conducting  
 21 discovery, the parties stipulate to extend deadlines prescribed by the Case Management and  
 22 Pretrial Order.

23 Good cause exists for the extension of deadlines due to plaintiffs' delay in service of their  
 24 FRCP 26 Initial Disclosure. The FRCP 26 Initial Disclosures were originally due on August 25,  
 25 2011. Plaintiffs sought to extend the deadline to September 26, 2011. Plaintiffs then sought  
 26 another extension to November 1, 2011. These extensions were necessitated by plaintiff Dan  
 27 Martin's medical status. Due to a calendaring omission, plaintiffs failed to serve their Initial  
 28 Disclosure on November 1, 2012 and are still in the process of preparing the disclosure.

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1 It was also agreed by the parties that in an effort to comply with the Court-ordered  
 2 mediation deadline of February 2, 2012, plaintiffs would informally provide defendant with  
 3 information relating to plaintiff Martin's pre-existing quadriceps injury. Plaintiffs have not yet  
 4 been able to provide defendant with the requested information. Because defendant believes this  
 5 information is critical to the issue of liability, defendant is not in a position to meaningfully  
 6 participate in mediation.

7 In the interests of avoiding prejudice to defendant by not having received plaintiffs' Initial  
 8 Disclosure and also with the objective of making the mediation a meaningful process, the parties  
 9 have agree to modify dates and deadlines as follows:

Case Event	Original Date	Revised Date
ADR Completion Date	2/2/12	4/2/12
Non Expert Discovery Completion Date	8/31/12	10/15/12
Expert Discovery Completion Date	10/4/12	10/31/12

15 Dated: December 1, 2011

ROUDA, FEDER, TIETJEN & MCGUINN

17 By: /s/ Cynthia McGuinn  
 Cynthia McGuinn  
 Miles B. Cooper  
 Attorneys for Plaintiffs KATHLEEN  
 LUCAS and DAN MARTIN

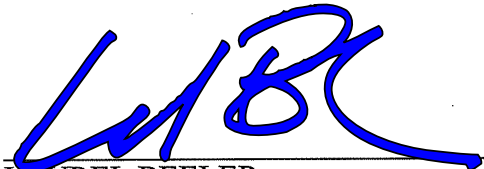
20 Dated: December 1, 2011

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22 By: /s/ John W. Ranucci  
 John W. Ranucci  
 Liza Siu Mendoza  
 Attorneys for Defendant  
 THE HERTZ CORPORATION

25 IT IS SO ORDERED.

26 Dated: December 2, 2011

27   
 LAUREL BEELER  
 United States Magistrate Judge