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AMERICA, LLC  
7

8 UNITED STATES DISTRICT COURT

9 NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION  
10

11 GANG CHEN,

12 Plaintiff,

13 v.

14 BMW OF NORTH AMERICA, LLC, AND  
DOES 1 THROUGH DOE 10, INCLUSIVE,

15 Defendants.  
16

CASE NO. CV11 1668 DMR  
Action Filed: April 6, 2011

**STIPULATION AND ~~PROPOSED~~  
ORDER TO EXTEND DISCOVERY  
COMPLETION DATE**

17 Plaintiff GANG CHEN ("CHEN") and defendant BMW of NORTH AMERICA, LLC ("BMW  
18 NA") through their respective attorneys of record, hereby stipulate as follows:

19 WHEREAS, at the initial Case Management Conference the Court set a discovery completion  
20 date of December 27, 2011;

21 WHEREAS, although the parties have acted diligently in attempting to complete discovery,  
22 they have not been successful;

23 WHEREAS, due to a personal family matter, counsel for BMW NA, William Buranich, was  
24 previously unavailable and counsel for plaintiff CHEN, Michael Devlin, has only recently been  
25 assigned to the file;

26 WHEREAS, the court has previously continued the mediation completion date to January 11,  
27 2012, and the trial date is currently May 14, 2012;

1 WHEREAS, CHEN and BMW NA request that this Court continue the current discovery  
2 completion date March 1, 2012.

3 THEREFORE IT IS STIPULATED by and between CHEN and BMW NA that the deadline  
4 for completion of discovery is extended from December 27, 2011 to March 1, 2012.

5 This Stipulation may be signed in counter-parts, each counter-part having the same force and  
6 effect as originals, and facsimile signatures shall be deemed to have the same force as originals.

7  
8 DATED: November 22, 2011 THE BICKEL LAW FIRM, INC.

9  
10 By: /s/ Michael Devlin  
11 Michael Devlin, Esq.  
Attorneys for Plaintiff GANG CHEN

12 DATED: November 22, 2011 LEWIS BRISBOIS BISGAARD & SMITH LLP

13  
14 By: /s/ William P. Buranich  
15 Roger S. Raphael, Esq.  
16 William P. Buranich, Esq.  
Attorneys for Defendant BMW OF NORTH  
17 AMERICA, LLC

18 **ORDER**

19 IT IS ORDERED, based upon the stipulation of the parties that the deadline to complete  
20 discovery in this matter is continued from December 27, 2011 to March 1, 2012.

21 All other case management dates shall remain the same.

22  
23 DATED: November <sup>23</sup>\_\_\_\_, 2011

24 By \_\_\_\_\_  
25 DONNA M. RYU  
26 Magistrate Judge of the  
27 United States District Court