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AMERICA, LLC
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8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

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
Revised

**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;

28

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.

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

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

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

19 **ORDER**

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

22 All other case management dates shall remain the same.

23 DATED: November ²³, 2011

24 By: Donna M. Ryu
25 DONNA M. RYU
26 Magistrate Judge of the
27 United States District Court
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