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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 ORDER TO
 EXTEND EXPERT DISCOVERY DATES
AS MODIFIED**

Trial date: May 14, 2012

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 various dates relating to
 20 expert disclosure, rebuttal expert disclosure and expert discovery completion;

21 WHEREAS, out of necessity the parties have previously obtained from the court an extension
 22 of the non-expert discovery cut-off until March 1, 2012;

23 WHEREAS, such order should have also addressed expert discovery dates to coincide with the
 24 new non-expert discovery date, allowing regular discovery to be completed before expert discovery
 25 commences;

26 WHEREAS, CHEN and BMW NA request that this Court continue the date for expert
 27 disclosures to March 1, 2012, the date for rebuttal expert disclosures to March 15, 2012 and the expert
 28 discovery completion date to March 29, 2012.



