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8
 9 UNITED STATES DISTRICT COURT
 10 NORTHERN DISTRICT
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12 FELIPE CALDERON,
 13 Plaintiff,
 14 v.
 15 DAVEY TREE SURGERY COMPANY, and
 DOES 1-50,
 16 Defendant.
 17

Case No. 4:11-CV-05486-SBA

**STIPULATION AND ORDER TO
 EXTEND DISCOVERY AND
 RELATED DEADLINES**

18 Plaintiff FELIPE CALDERON (“Plaintiff”) and Defendant DAVEY TREE
 19 SURGERY COMPANY (“Defendant”) (collectively “The Parties”), hereby stipulate and agree to
 20 the following:

21 WHEREAS, on November 6, 2012, the Honorable Sandra Brown Armstrong,
 22 pursuant to the Parties’ stipulation, ordered the Parties: to complete all discovery, with the exception
 23 of expert discovery, by January 4, 2013; to designate expert witnesses by January 4, 2013; to
 24 disclose rebuttal witnesses by February 1, 2013; and to complete all discovery pertaining to expert
 25 witnesses by March 8, 2013 (Court Docket No. 21);

26 WHEREAS, on November 6, 2012, the Honorable Sandra Brown Armstrong,
 27 pursuant to the Parties’ stipulation, ordered that all motions, including dispositive motions shall be
 28 heard on or before March 12, 2013 at 1:00 p.m. (Court Docket No. 21);

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STIPULATION AND [PROPOSED] ORDER TO EXTEND DISCOVERY AND RELATED DEADLINES

1 February 15, 2013;

2 2. The deadline the deadline to designate expert witnesses be continued from
3 January 4, 2013 to February 15, 2013;

4 3. The deadline to disclose rebuttal witnesses be continued from February 1,
5 2013 to March 15, 2013;

6 4. The deadline to complete all discovery pertaining to expert witnesses be
7 continued from March 8, 2013 to March 29, 2012; and

8 5. The deadline to hear motions be continued from March 12, 2013 at 1:00 p.m.
9 to April 26, 2013 at 1:00 p.m.

10 **IT IS SO STIPULATED**

11
12 Dated: December 7, 2012

13 /s/ Michael E. Brewer
14 RICHARD H. HARDING
15 MICHAEL E. BREWER
16 LITTLER MENDELSON, P.C.
Attorneys for Defendant
DAVEY TREE SURGERY COMPANY

17
18 Dated: December 7, 2012

19 /s/ Michael J. Reed
20 MICHAEL J. REED
21 Attorney for Plaintiff
22 FELIPE CALDERON

23 As good cause exists due to Parties' attempts to resolve this matter before incurring the
24 significant costs and expense associated with the completion of additional discovery, discovery
25 motions, and trial preparation and before incurring the disruption to the business of Defendant, the
26 Court hereby modifies its Order filed in this matter on November 6, 2012, as stipulated above.

27 **IT IS SO ORDERED.**

28 Dated: December 10, 2012

By: Sandra B. Armstrong
Honorable Sandra Brown Armstrong
UNITED STATES DISTRICT JUDGE

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