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11 Attorneys for Defendants
ADMIRAL LINE LIMITED and
12 ZODIAC MARITIME AGENCIES LIMITED

13
14 IN THE UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA

17 DEBORAH SANTANA-WATTS

18 Plaintiff,

19 vs.

20 ADMIRAL LINE (UK) LIMITED; ZODIAC
21 MARITIME AGENCIES LIMITED AND
DOES 1 THROUGH 20

22 Defendants.
23

) Case No.: C 12-02701 DMR

) **STIPULATION AND [PROPOSED]**
) **ORDER TO EXTEND DEADLINES FOR**
) **DISCOVERY AND DISCLOSURES OF**
) **EXPERT WITNESSES**

) Complaint Filed: May 25, 2012
) Trial Date: February 8, 2014

24
25 The parties, plaintiff, Deborah Santana-Watts, and defendants, Admiral Line Limited and
26 Zodiac Maritime Agencies Limited, by and through their counsel of record, submit this stipulation
27 and proposed order to extend the discovery deadline and the date to disclose expert witnesses and
28 reports. The stipulation and request for an order are based upon the following:

STIPULATION AND [PROPOSED] ORDER TO EXTEND DEADLINES FOR DISCOVERY AND
DISCLOSURES OF EXPERT WITNESSES
Case No. C 12-02701 DMR

1 1. Currently, September 24, 2013, is the date that the Court set for the close of non-
2 expert discovery and for the disclosure of expert witnesses and reports.

3 2. The parties recently participated in a mediation session with Jonathan D. Schmidt,
4 who at the time of his appointment as the Northern District ADR panel mediator in this case was
5 an Assistant U.S. Attorney for the Northern District of California. The parties made substantial
6 progress at the mediation session, exchanging numerous offers and counter-offers, but the case did
7 not settle. Mr. Schmidt has scheduled a follow-up conference call to continue negotiations for
8 October 7, 2013.

9 3. Prior to the deadline for non-expert discovery, the defendants noticed the
10 depositions of two potential longshore witnesses and the plaintiff requested an inspection of the
11 vessel on which plaintiff's accident occurred. The parties agreed to postpone the depositions until
12 a time following the mediation session and for a time that the schedule of plaintiff's counsel could
13 accommodate. As to the vessel inspection, counsel for the defendants has ascertained that the
14 vessel is currently at sea, sailing between ports in the Far East. It is not currently scheduled to call
15 at the Port of Oakland, but is scheduled to call at the Port of Tacoma, Washington, on or about
16 October 21, 2013. Although the defendants are in a position to disclose experts and produce
17 reports by the current deadline, the plaintiff will not be in that position until the planned vessel
18 inspection can be completed.

19 4. Under the circumstances, the parties request that the non-expert discovery deadline
20 and the date for expert disclosures and reports be extended until October 31, 2013.

21 5. Neither party intends to file a dispositive motion. Thus, the only other currently
22 scheduled deadlines that would be affected by this request are those relating to the disclosure of
23 rebuttal expert witnesses and the depositions of expert witnesses. The parties request that those
24 deadlines, which are currently set for October 8, 2013 and October 22, 2013, respectively, be
25 extended to November 15, 2013 and November 30, 2013, respectively.

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1 6. These extensions will give the parties the further opportunity to fully explore
2 settlement opportunities prior to their beginning of their preparation for trial.

3 THE PARTIES SO STIPULATE.

4
5 Dated: September 24, 2013

LAW OFFICES OF MARYLON M. BOYD

6
7 /s/ Marylon M. Boyd
8 By _____

9 Marylon M. Boyd
10 Attorney for Plaintiff
11 DEVBORAH SANTANA-WATTS

12
13 Dated: September 24, 2013

FLYNN, DELICH & WISE LLP

14 /s/ James B. Nebel
15 By _____

16 James B. Nebel
17 Attorneys for Defendants
18 ADMIRAL LINE LIMITED and
19 ZODIAC MARITIME AGENCIES LIMITED

20 **ORDER**

21 Pursuant to the foregoing stipulation, the Court GRANTS the parties' request and extends
22 the non-expert discovery deadline and the date for expert disclosures and reports until October 31,
23 2013. In addition, the Court extends the deadlines for the disclosure of rebuttal expert witnesses
24 and the depositions of expert witnesses to November 15, 2013 and November 30, 2013,
25 respectively.

26 IT IS SO ORDERED.

27
28 Dated: September

