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Attorneys for Defendants
ADMIRAL LINE LIMITED and
ZODIAC MARITIME AGENCIES LIMITED

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

DEBORAH SANTANA-WATTS

Plaintiff,

vs.

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

Defendants.

Case No.: C 12-02701 DMR

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

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

The parties, plaintiff, Deborah Santana-Watts, and defendants, Admiral Line Limited and Zodiac Maritime Agencies Limited, by and through their counsel of record, submit this stipulation and proposed order to further extend the discovery deadline and the date to disclose expert witnesses and 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, the parties stipulated to extend non-expert discovery and for the
2 disclosure of expert witnesses and reports to October 31, 2013.

3 2. The parties recently participated in further mediation conference with Jonathan D.
4 Schmidt, who at the time of his appointment as the Northern District ADR panel mediator in this
5 case was an Assistant U.S. Attorney for the Northern District of California. The parties made
6 substantial progress at the conference including Defendants agreeing to provide certain discovery
7 that would save the parties certain expenses. The parties agree that Plaintiff's expert would like to
8 have an opportunity to review the additional information before providing an expert report. Mr.
9 Schmidt has scheduled a follow-up conference call to continue negotiations for November 13,
10 2013.

11 3. Prior to the deadline for non-expert discovery, the defendants noticed the
12 depositions of two potential longshore witnesses and the plaintiff requested an inspection of the
13 vessel on which plaintiff's accident occurred. The parties agreed to postpone the depositions until
14 a time following the mediation session and for a time that the schedule of plaintiff's counsel could
15 accommodate. As to the vessel inspection, counsel for the defendants agreed to provide
16 photographs of the vessel with loaded cargo configured similar to the way the vessel was loaded at
17 the time of the accident. As of today, the Ship's representatives have not been able to take such
18 photographs. In addition the depositions of the two witnesses are scheduled to occur on October
19 31, 2013, and their deposition transcripts will not be prepared for at minimum another two weeks.

20 4. Although the defendants are in a position to disclose experts and produce reports
21 by the current deadline, the plaintiff will not be in that position until the additional information is
22 provided.

23 5. Under the circumstances, the parties request that the non-expert discovery deadline
24 and the date for expert disclosures and reports be extended until November 29, 2013.

25 6. Neither party intends to file a dispositive motion. Thus, the only other currently
26 scheduled deadlines that would be affected by this request are those relating to the disclosure of
27 rebuttal expert witnesses and the depositions of expert witnesses. The parties request that the
28 deadline for non-expert and expert disclosure be extended to November 29, 2013.

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

THE PARTIES SO STIPULATE.

Dated: October 30, 2013

LAW OFFICES OF MARYLON M. BOYD

/s/ Marylon M. Boyd
By _____
Marylon M. Boyd
Attorney for Plaintiff
DEVBORAH SANTANA-WATTS

Dated: October 30, 2013

FLYNN, DELICH & WISE LLP

/s/ James B. Nebel
By _____
James B. Nebel
Attorneys for Defendants
ADMIRAL LINE LIMITED and
ZODIAC MARITIME AGENCIES LIMITED

ORDER

Pursuant to the foregoing stipulation, the Court GRANTS the parties' request and extends the non-expert and expert ^{disclosure} discovery deadline in this matter through November 29, 2013.

IT IS SO ORDERED.

November 5,
Dated: ~~October~~ November 5, 2013

The expert discovery deadline
is December 15, 2013.


UNITED STATES MAGISTRATE JUDGE