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Attorneys for Defendants
 14 FLUOR CORPORATION and
 15 FLUOR MAINTENANCE SERVICES, INC.

16 **UNITED STATES DISTRICT COURT**
 17 **NORTHERN DISTRICT OF CALIFORNIA**
 18

19 TIMOTHY RAY RICHARDSON
 20 Plaintiff,
 21 v.
 22 FLUOR CORPORATION; FLUOR
 MAINTENANCE SERVICES, INC.; DOES 1
 23 THROUGH 10, INCLUSIVE,
 24 Defendant.

Case No. CV-13-1908-SBA

SUPPLEMENTAL STIPULATION AND
~~**PROPOSED**~~ **ORDER FOR EXTENDING**
EXPERT DISCOVERY DEADLINES

Complaint Filed: April 25, 2013
 Trial Date: October 15, 2014

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1 Plaintiff Timothy Ray Richardson and defendants Fluor Corporation (“Fluor”) and Fluor
2 Maintenance Services, Inc. (“FMS”), through their respective counsel, respectfully request the
3 Court modify its pretrial scheduling order (Dkt No. 38) to extend the deadline to complete expert
4 discovery.

5 1. The Parties request the Court extend the deadline for expert discovery to August 31,
6 2014. The current deadline to complete expert discovery is July 18, 2014. (Dkt. No. 66.)

7 2. This extension is necessary to permit the deposition of plaintiff’s retained expert,
8 Beth De Lima (set for August 13, 2014), and defendants’ retained expert, Ronald Roberts, whose
9 deposition has yet to be set. The parties are meeting and conferring regarding finalizing a date for
10 Dr. Roberts’ deposition.

11 3. The requested extension will not conflict with any other pretrial scheduling
12 deadlines.

13 4. Therefore, pursuant to Local Rule 16-2(d)-(e) and Local Rule 7, the Parties hereby
14 submit this stipulation for modification of the pretrial scheduling order (Dkt. No. 38).
15

16 DATED: July 17, 2014

LAW OFFICES OF KAPLAN & MACLELLAN

17 By: /s/ Douglas MacLellan
18 Douglas Cameron MacLellan

19 Attorneys for Plaintiff
20 TIMOTHY RAY RICHARDSON

21 DATED: July 17, 2014

OGLETREE, DEAKINS, NASH, SMOAK &
22 STEWART, P.C.

23 By: /s/ Jill Cartwright
24 Thomas M. McInerney
25 Jill V. Cartwright

26 Attorneys for Defendants
27 FLUOR CORPORATION and
28 FLUOR MAINTENANCE SERVICES, INC.

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SIGNATURE ATTESTATION

Pursuant to Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this document has been obtained from the other signatories.

DATED: July 17, 2014

By: /s/ Jill V. Cartwright
Jill V. Cartwright

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: 7/21/2014


Sandra Brown Armstrong
United States District Judge

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