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 20 BARBARA WOOD

21 UNITED STATES DISTRICT COURT  
 22 NORTHERN DISTRICT OF CALIFORNIA

23 BARBARA WOOD,  
 24 Plaintiff,  
 25 v.

26 IGATE TECHNOLOGIES, INC., a business entity,  
 27 form unknown; and Does 1 through 25, inclusive,  
 28 Defendant.

Case No. 3:15-cv-00799-JSW  
 STIPULATION AND [~~PROPOSED~~] ORDER  
 TO EXTEND CASE DEADLINES

TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:

WHEREAS, pursuant to the Court’s August 17, 2015 Order (Docket No. 48), the Court set deadlines for the close of expert and non-expert discovery, dispositive motions, and trial;

WHEREAS, the parties have been engaged in discovery, but because of confidentiality agreements with third parties and for reasons beyond Defendant’s control, Defendant has only very recently been able to produce to Plaintiff key documents and information critical to this case;

1 WHEREAS, since the parties began discovery, the Defense has worked diligently to  
2 secure permission to produce such key documents and information, and obtained permission to  
3 produce it on Monday, February 8;

4 WHEREAS, the parties have not been able to conduct meaningful depositions without  
5 access to these key documents and information;

6 WHEREAS, now that Defendant has been able to produce the key documents and  
7 information, the parties have scheduled necessary depositions for the last week of February and  
8 first two weeks of March, 2016;

9 WHEREAS, the parties believe that an extension of the current case deadlines are  
10 necessary to conduct meaningful discovery on one of the most critical issues in this matter.

11 THEREFORE, for good cause showing, the parties request that the Court amend the  
12 previously-scheduled deadlines as follows:

13 Close of Non-expert Discovery: March 31, 2016

14 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

15 DATED: February 19, 2016 /s/ Joseph Clapp  
16 Attorneys for Plaintiff

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18 DATED: February 19, 2015 /s/ Sacha Steenhoek  
19 Attorneys for Defendant

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PURSUANT TO STIPULATION, and having shown good cause, the case deadlines are extended as follows:

Close of Non-expert Discovery: March 31, 2016

IT IS SO ORDERED.

DATED: February 22, 2016

  
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HON. JEFFREY S. WHITE  
UNITED STATES DISTRICT JUDGE

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