1 2	JOSEPH CLAPP, Bar No. 99194 AIMAN-SMITH & MARCY 7767 Oakport Street, Suite 1150	
3	Oakland, CA 94621 Tel.: 510.590.7115	
4	Fax: 510.562.6830 e-mail: djc.asm@gmail.com	
5	ATTORNEYS FOR PLAINTIFF	
6	BARBARA WOOD	
7	MELINDA S. RIECHERT, BAR NO. 65504 SACHA M. STEENHOEK, BAR NO. 253743 MORGAN, LEWIS & BOCKIUS LLP	
8	One Market, Spear Street Tower San Francisco, CA 94105-1126	
9	Tel.: +1.415.442.1000	
10	Fax: +1.415.442.1001 e-mail: melinda.riechert@morganlewis.com	
11	e-mail: sacha.steenhoek@morganlewis.com	
12	Attorneys for Defendant IGATE TECHNOLOGIES, INC.	
13		
14	UNITED STATES D	ISTRICT COURT
15	NORTHERN DISTRIC	T OF CALIFORNIA
16	BARBARA WOOD,	Case No. 3:15-cv-00799-JSW
17	Plaintiff,	STIPULATION AND [PROPOSED] ORDER TO EXTEND PRE-TRIAL
18	V.	AND TRIAL DATES AND DEADLINES IN LIGHT OF
19	IGATE TECHNOLOGIES, INC., a business entity, form unknown; and Does 1 through 25,	SETTLEMENT AGREEMENT AS MODIFIED
20	inclusive,	AS MODIFIED
21	Defendant.	
22		
23		
24		
25		
26		
27		
28		
MORGAN, LEWIS & BOCKIUS LLP ATTORNEYS AT LAW SAM EDANGISCO		STIPULATION AND [PROPOSED] ORDER TO CONTINUE COURT DEADLINES Case No. 3:15-cv-00799-JSW

1	WHEREAS, trial is currently scheduled for August 29, 2016;		
2	WHEREAS, there is a Pre-Trial Conference currently scheduled for August 8, 2016;		
3	WHEREAS, pursuant to the Court's order, from July 28, 2016 (Doc. No. 89), the		
4	continued deadline to file pretrial materials with the Court is Monday August 1, 2016;		
5	WHEREAS the parties have reached a settlement and have agreed upon the fundamental		
6	terms of a settlement agreement as of July 29, 2016;		
7	WHEREAS the parties have agreed to and request to continue all pre-trial deadlines and		
8	due dates, as well as the pre-trial conference, so that they may draft, finalize and execute a		
9	settlement agreement, and remit settlement payment;		
10	WHEREAS, the Parties have agreed to extend all pre-trial deadlines, due dates and		
11	conference approximately sixty (60) days to allow the parties to finalize their settlement		
12	agreement and remit payment;		
13	THEREFORE, for good cause shown, the parties request that the Court current deadlines		
14	accordingly:		
15	October 3, 2016 - Deadline to submit all pre-trial documents to the Court;		
16	October 17, 2016 – Pre-Trial Conference;		
17	• October 31, 2016 – Jury Trial.		
18			
19	DATED: July 29. 2016 /s/ Joseph Clapp Attorneys for Plaintiff		
20			
21	DATED: July 29, 2016 /s/ Melinda Riechert Attorneys for Defendant		
22	Theomey's for Berendun		
23			
24			
25			
26			
27			
28			

1	PROPOSED ORDER	
2		
3	PURSUANT TO STIPULATION, and having shown good cause, the case deadlines are	
4	extended as follows:	
5	October 3, 2016 - Deadline to submit all pre-trial documents to the court	
6	 October 17, 2016 – Pre-Trial Conference November 7, 2016 October 31, 2016 – Jury Trial. 	
7	• October 31, 2016 – Jury Trial.	
8		
9	IT IS SO ORDERED.	
10	DATED: August 1, 2016	
11	HON. JETTREY S. WHITE UNITED STATES DISTRICT JUDGE	
12		
13	DB2/ 30473768.1	
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		
26		
27		

28