

1 Balam O. Letona, Esq. (Cal. Bar No. 229642)
 2 Law Office of Balam O. Letona, Inc.
 3 1509 Seabright Avenue, Suite C1
 4 Santa Cruz, CA 95062
 5 Telephone: (831) 421-0200
 6 Facsimile: (831) 421-0400
 7 balam@letonalaw.com

8 Luke Wallace
 9 Robert David Humphreys
 10 HUMPHREYS WALLACE HUMPHREYS, P.C.
 11 9202 S. Toledo Avenue
 12 Tulsa, OK 74137
 13 luke@hwh-law.com
 14 david@hwh-law.com
 15 *Pro Hac Vice*

16 Attorney for Plaintiff:
 17 Cynthia Todd

18 **IN THE UNITED STATES DISTRICT COURT**
 19 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

20 CYNTHIA TODD,

21 Plaintiff,

22 vs.

23 AT&T CORP., EQUIFAX INFORMATION
 24 SERVICES LLC., NATIONAL CONSUMER
 25 TELECOM and UTILITIES EXCHANGE, INC.,
 26 EXPERIAN INFORMATION SOLUTIONS INC.,
 27 and DOES 1-10.

28 Defendants.

Case No. 16-cv-03357-HSG

**STIPULATION AND ORDER
 EXTENDING TIME FOR
 DISCOVERY AND EXTENDING
 DEADLINE TO DESIGNATE
 REBUTTAL EXPERTS**

The parties hereby request and stipulate to move the non-expert and expert discovery deadline to April 28, 2017 and the deadline to designate rebuttal experts with reports to April

**STIPULATION AND ORDER EXTENDING DISCOVERY DEADLINE AND
 REBUTTAL EXPERTS**

1 14, 2017. Currently, the discovery deadline closes on April 14, 2017 and the deadline to
2 designate rebuttal experts is March 31, 2017. All other dates to remain the same.

3 The parties have engaged in extensive written discovery including follow-up
4 discovery. Plaintiff's deposition was conducted on March 6, 2017. The remaining defendant
5 depositions have been noticed and will be conducted in April 2017. On March 17, 2017,
6 Plaintiff disclosed her expert with report. The parties have scheduled mediation to occur on
7 April 20, 2017, with the Honorable Judge Ware, Ret. The parties have not yet scheduled the
8 deposition of Plaintiff's expert. Furthermore, Plaintiff expects to depose Defendant's rebuttal
9 expert.

10 The parties believe additional time is needed to conduct meaningful discovery, have a
11 productive mediation session, depose Plaintiff's and Defendants' rebuttal experts and that
12 moving the discovery deadline to April 28th and the deadline to designate rebuttal experts to
13 April 14th will facilitate this goal.

14 Previously, the parties agreed to move the deadline to disclose experts to March 17,
15 2017 and to move the close of non-expert discovery to April 14, 2017. See Docket #68, #70.
16 All other dates to remain the same.

17 As such, the parties agree and stipulate to the following:

18 April 14, 2017 Last Day to Designate Rebuttal Experts with Reports

19 April 28, 2017 Fact and Expert Discovery Closes

20 **SO STIPULATED:**

21
22 Dated: March 22, 2017

AT&T SERVICES, INC. - LEGAL
DEPARTMENT

23
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25 By: /s/ Robert B. Mullen
Robert B. Mullen

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27 **STIPULATION AND ORDER EXTENDING DISCOVERY DEADLINE AND**
28 **REBUTTAL EXPERTS**

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Attorneys for Defendant
AT&T CORP.

Dated: March 22, 2017

KING & SPALDING LLP

By: /s/ J. Anthony Love

J. Anthony Love
Attorney for Defendant Equifax Information
Solutions, Inc., and NCTUE

Dated: March 22, 2017

LAW OFFICE OF BALAM O. LETONA, INC.

By: /s/ Balam O. Letona

Balam O. Letona
Attorney for Plaintiff
CYNTHIA TODD

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: March 27, 2017



**Hon. Haywood S. Gilliam, Jr.
United States District Judge**