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5 Attorneys for Plaintiff,  
 6 Francisca Moralez

7  
 8 **UNITED STATES DISTRICT COURT**  
 9 **NORTHERN DISTRICT OF CALIFORNIA**

10 FRANCISCA MORALEZ,

11 )  
 12 ) Plaintiff,

13 ) vs.

14 )  
 15 ) BEVERAGES & MORE, INC. dba BEVMO,  
 et al.,

16 ) Defendants.  
 17 )  
 18 )

No. 4:17-cv-05132-HSG

**STIPULATION TO EXTEND FACT  
 DISCOVERY DEADLINE; ORDER**

19  
 20 Plaintiff, Francisca Moralez (“Plaintiff”), noticed the deposition of Defendant  
 21 Beverages & More, Inc. (“Defendant”)’s Person Most Knowledgeable (“PMK”) for November  
 22 7, 2018. On November 1, 2018, Defendant filed a request to stay this matter (Dkt. 41). On  
 23 November 2, 2018, Defendant objected to the deposition notice of its PMK because its stay  
 24 request was pending before this Court and the deponent was not available on the chosen date.  
 25 The Court has yet to rule on the stay request.

26 Additionally, the parties have met and conferred regarding Defendant’s responses to  
 27 Plaintiff’s Request for Production of Documents. Defendant has agreed to produce documents,  
 28 however, due to the Thanksgiving holiday, Defendant cannot assemble the documents to be

1 produced prior to the discovery deadline, which is November 23, 2018. Therefore, in order for  
2 the parties to finish discovery in this matter, they request to move the fact discovery deadline  
3 up to, and including December 13, 2018. **The parties are not seeking to alter any other date**  
4 **in the Court's Scheduling Order.**

5 **IT IS HEREBY STIPULATED** by and between Plaintiff and Defendant  
6 (collectively, the "Parties"), the only parties remaining in this action, through their respective  
7 attorneys of record, that the Parties can conduct fact discovery up to, and including December  
8 13, 2018. Defendant shall provide a corporate representative for the PMK deposition on  
9 December 13, 2018. Defendant will also either provide documents that it agreed to produce in  
10 response to Plaintiff's Request for Production of Documents to Plaintiff, or make them  
11 available for copying by Plaintiff, by December 10, 2018.

12  
13 Dated: November 20, 2018

MISSION LAW FIRM, A.P.C.

14 /s/ Zachary M. Best

15 Zachary M. Best  
16 Attorneys for Plaintiff,  
Francisca Moralez

17  
18 Dated: November 20, 2018

SHEPPARD, MULLIN, RICHTER  
& HAMPTON LLP

19 /s/ Michael J. Chilleen

20 Gregory F. Hurley  
21 Michael J. Chilleen  
22 Attorneys for Defendant,  
Beverages & More, Inc.

23 **ATTESTATION**

24 Concurrence in the filing of this document has been obtained from each of the individual(s)  
25 whose electronic signature is attributed above.

26 /s/ Zachary M. Best

27 Zachary M. Best  
28 Attorneys for Plaintiff

**ORDER**

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The Parties having so stipulated and good cause appearing,

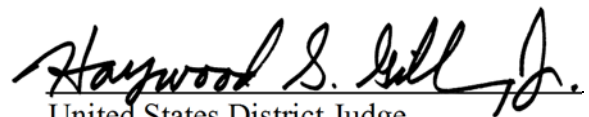
**IT IS HEREBY ORDERED** that the fact discovery deadline in this matter is extended up to and including December 13, 2018.

**IT IS FURTHER ORDERED** that Defendant shall provide a corporate representative for the PMK deposition on December 13, 2018.

**IT IS FURTHER ORDERED** that Defendant will also either provide documents that it agreed to produce in response to Plaintiff's Request for Production of Documents to Plaintiff, or make them available for copying by Plaintiff, by December 10, 2018.

**IT IS SO ORDERED.**

Dated: November 21, 2018

  
United States District Judge