

1 Brent M. Karren (State Bar No. 291038)
 2 bkarren@mgmlaw.com
 3 Emily M. Westfall (State Bar No. 314769)
 4 ewestfall@mgmlaw.com
 5 **MANNING GROSS + MASSENBURG LLP**
 201 Spear Street, Suite 1800
 San Francisco, California 94105
 Tel: (415) 512-4381
 Fax: (415) 512-6791

6 Attorneys for Defendant
 7 **ILLINOIS TOOL WORKS INC.**

8 **IN THE UNITED STATES DISTRICT COURT**
 9 **NORTHERN DISTRICT OF CALIFORNIA**

LAW OFFICES OF
 MANNING GROSS + MASSENBURG LLP

10 MARY TOLLIVER, as heir to and
 11 representative of the ESTATE OF JOHNNY
 12 TOLLIVER, SR.; JOHNNY TOLLIVER, JR.
 as surviving child of JOHNNY TOLLIVER,
 13 SR.,

14 Plaintiffs,

15 vs.

16 CRANE CARRIER, et al.,

17 Defendants.

Case No.: 4:18-cv-01078-KAW

Assigned to:
 Hon. Kandis A. Westmore

**STIPULATION AND [~~PROPOSED~~] ORDER
 CONTINUING INITIAL CASE
 MANAGEMENT CONFERENCE
 TO JUNE 12, 2018 AT 1:30 PM**

Complaint Filed: December 12, 2017
 Date Removed: February 20, 2018
 Trial Date: Not Set

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 19 This Stipulation is entered into by and among the Plaintiffs and Nominal Defendants,
 20 MARY TOLLIVER, as heir to and representative of the ESTATE OF JOHNNY TOLLIVER, SR.;
 21 JOHNNY TOLLIVER, JR. as surviving child of JOHNNY TOLLIVER, SR; and ISAAC ISRAEL
 22 TOLLIVER, as surviving child of JOHNNY TOLLIVER, SR., by and through his mother and
 23 Guardian, ARIE CROCKETT (“Plaintiffs”), and Defendant, ILLINOIS TOOL WORKS INC.
 24 (“ITW”), answering party on behalf of named defendants Illinois Tool Works, Inc. and Crane
 25 Carrier, by and through their respective counsel;

26 Whereas, lead trial counsel for ITW is unavailable on the scheduled date for the Initial Case
 27 Management Conference on May 29, 2018;

28 Whereas, the parties anticipate consolidating the following two related matters:

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a. *Isaac Israel Tolliver, as surviving child of Johnny Tolliver, Sr., by and through his mother and Guardian, Arie Crockett v. Crane Carrier Company, et al.; Case No. 4:18-cv-01091-SBA*

b. *Mary Tolliver, as heir to and representative of the Estate of Johnny Tolliver, Sr., Johnny Tolliver, Jr., as surviving child of Johnny Tolliver, Sr. v. Crane Carrier, et al.; Case No. 4:18-cv-01078-KAW*

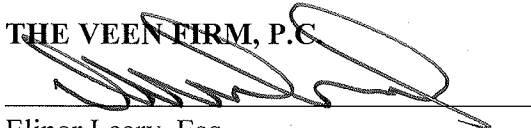
Whereas, Counsel for all parties of record in both matters have met and conferred and agree that June 12, 2018 is a mutually agreeable date for which all counsel will be available;

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel for Plaintiffs and ITW, that:

1. All counsel of record agree to and request that the Court continue the Initial Case Management Conference to June 12, 2018 at 1:30 P.M.
2. All counsel of record agree to and request that the Court extend the deadline for filing a Joint Case Management Statement and making Rule 26 Disclosures to May 31, 2018.


Dated: May 15, 2018

THE VEEN FIRM, P.C


Elinor Leary, Esq.
David Winnett, Esq.,
Attorneys for Plaintiffs,
MARY TOLLIVER,
and JOHNNY TOLLIVER, JR.

Dated: May 16, 2018

MANNING GROSS + MASSENBURG, LLP



Brent Karren, Esq.
Emily Westfall, Esq.,
Attorneys for Defendant,
ILLINOIS TOOL WORKS INC.

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[PROPOSED] ORDER

The above stipulation having been considered and good cause appearing therefore,
PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: 5/23/18



The Honorable Kandis A. Westmore
MAGISTRATE JUDGE