

1 ADAM WANG, Bar No. 201233  
 12 South First Street, Suite 708  
 2 San Jose, CA 95113  
 Tel: (408) 292-1040  
 3 Fax: (408) 416-0248

4 Attorney for Plaintiffs

5 Barzin Barry Sabahat  
 Anchor Law Group  
 1975 Hamilton Avenue, Suite 27  
 6 San Jose, California 95125  
 Telephone 408-559-1173  
 7 Fax 408-559-6153  
 8

9 Attorney for Defendants

10 UNITED STATES DISTRICT COURT  
 FOR NORTHERN DISTRICT OF CALIFORNIA

11 Cessar Santacruz and Javier Valencia

12 Plaintiffs,

13 vs.

14 FRENCH CONNECTION BAKERY INC.  
 15 DBA COCOLA BAKERY, AMIRALI AMINI  
 ALIABADI & DOES 1 THOUGHT 10

16 Defendants

Consolidated Cases: C07-01118 PVT  
 C08-00996 PVT

**STIPULATED ORDER TO EXTEND  
 DISCOVERY CUTOFF DATE**

17 Parties, through their respective counsel, stipulate to extend the discovery cutoff date in  
 18 this case as follows:

19 1. The Court set the following case management schedule:

20 Fact Discovery Cutoff. . . . . 2/27/09  
 21 Deadline(s) for Filing Discovery Motions. . . . . See Civil Local Rule 26-2  
 Designation of Experts with Reports. . . . . 3/27/09  
 22 Designation of Rebuttal Experts with Reports. . . . . 4/24/09  
 Expert Discovery Cutoff. . . . . 5/29/09  
 23 Last Date for Hearing on Dispositive Motions . . . . . 10:00 a.m. on 7/14/09  
 Final Pretrial Conference. . . . . 2:00 p.m. on 8/25/09  
 24 Non-Jury Trial . . . . . 9:30 a.m. on 9/14/09

**STIPULATION TO EXTEND DISCOVERY CUTOFF  
 SANTACUZ V. FRENCH CONNECTION BAKERY INC. ET AL**

1 Consolidated Cases: C07-01118 PVT  
 C08-00996 PVT

1 2. Prior to the discovery cutoff deadline had run, counsel for both parties have met  
2 and conferred and agreed to continue the discovery cutoff deadline for 45 days. Due to Defense  
3 counsel's travel schedule, who did not return to the United States until February 26, 2009, Parties  
4 were unable to file the stipulation prior to February 27, 2009.

5 3. This case was filed was field a class action; Plaintiffs have failed to file motions  
6 to certify the classes pursuant to the time lines set by this Court. On December 8, 2008, this  
7 Court entered an order striking the class action allegations from the Complaint. Therefore, the  
8 remaining case will be prosecuted for tow individual Plaintiffs' claims.

9 4. In light of the fact current trial date is not until September 14, 2009, and the fact  
10 this case was reduced to only two individual claims, the requested continuance for discovery  
11 deadline will not affect the case management schedule currently in place

12 5. As such, parties through their counsel respectfully request the Court extend the  
13 discovery deadline by modifying the schedule in this case as follows:

Fact Discovery Cutoff. . . . .	4/30/09
Deadline(s) for Filing Discovery Motions. . . . .	.See Civil Local Rule 26-2
Designation of Experts with Reports. . . . .	5/8/09
Designation of Rebuttal Experts with Reports. . . . .	5/22/09
Expert Discovery Cutoff. . . . .	6/19/09
Last Date for Hearing on Dispositive Motions . . . . .	10:00 a.m. on 7/14/09
Final Pretrial Conference.. . . .	2:00 p.m. on 8/25/09
Non-Jury Trial . . . . .	9:30 a.m. on 9/14/09

18 Dated: March 6, 2009

By: /s/ ADAM WANG

Attorney for Plaintiffs

20 Dated: March 23, 2009

By: /s/ Barzin Barry Sabahat

Attorney for Defendants

22 **ORDER**

23 Pursuant to parties' stipulation, IT IS HEREBY ORDERED that the case management  
24 schedule be modified as follows:

Fact Discovery Cutoff. . . . .	4/30/09
Deadline(s) for Filing Discovery Motions. . . . .	.See Civil Local Rule 26-2
Designation of Experts with Reports. . . . .	5/8/09
Designation of Rebuttal Experts with Reports. . . . .	5/22/09

**STIPULATION TO EXTEND DISCOVERY CUTOFF**  
**SANTACUZ V. FRENCH CONNECTION BAKERY INC. ET AL**

1 Expert Discovery Cutoff..... 6/19/09  
2 Last Date for Hearing on Dispositive Motions ..... 10:00 a.m. on 7/14/09  
3 Final Pretrial Conference..... 2:00 p.m. on 8/25/09  
4 Non-Jury Trial ..... 9:30 a.m. on 9/14/09

5 IT IS SO ORDERED.

6 Dated: March 23, 2007

7 By:   
8 Patricia V. Trumbull  
9 US Magistrate Judge  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

**STIPULATION TO EXTEND DISCOVERY CUTOFF**

**SANTACUZ V. FRENCH CONNECTION BAKERY INC. ET AL**