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13 UNITED STATES DISTRICT COURT
 14 NORTHERN DISTRICT OF CALIFORNIA

15 CHAD NICHOLAS,
 16 Plaintiff,

17 vs.

18 UNITED AIR LINES, INC., and DOES 1
 19 through 50, inclusive,
 20 Defendants.

DOCKET No. C 09-02089 RS

**STIPULATION AND ~~PROPOSED~~ ORDER
 REGARDING NON-EXPERT DISCOVERY
 AND EXPERT DISCOVERY**

21 The parties have met and conferred and have agreed to stipulate as follows:

- 22 1. That the parties shall be allowed to conduct certain discovery beyond the May 19, 2010
 23 discovery cut-off. The discovery which is permitted to take place after May 19, 2010
 24 includes:
 - 25 a. Any depositions noticed before the May 19, 2010 discovery cut off;
 - 26 b. The deposition of Shirley Nicholas;
 - 27 c. Plaintiff will agree to produce updated medical records as his treatment
 continues.
2. Due to the unavailability of certain deponents until after June 1, the parties have agreed
 to postpone expert disclosures & discovery as follows:

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- a. Plaintiff's expert disclosure is due June 16, 2010.
- b. Defendant's expert disclosure is due June 30, 2010.
- c. Expert discovery will be completed by July 14, 2010.

Dated: June 1, 2010

SHEA & SHEA

/s/

By: _____
 NICOLE N. HANCOCK, ESQ.
 Attorneys for Plaintiff
 CHAD NICHOLAS

Dated: June 1, 2010

SHEA & SHEA

/s/

By: _____
 ELIZABETH RHODES, ESQ.
 Attorneys for Defendant
 UNITED AIR LINES, INC.

~~[PROPOSED]~~ ORDER

IT IS SO ORDERED.

Dated: 6/2/10



 UNITED STATES MAGISTRATE JUDGE