

1 ANN A. NGUYEN (SBN 178712)
 2 ROBINSON & WOOD, INC.
 227 N. First Street
 San Jose, California 95113
 3 Telephone: 408-298-7120
 Facsimile: 408-298-0477
 4 Email: aan@robinsonwood.com



5 Attorneys for Plaintiff DANG

6 UNITED STATES DISTRICT COURT
 7 NORTHERN DISTRICT OF CALIFORNIA
 8 SAN JOSE DIVISION

9 CUC DANG,
 10 Plaintiff,
 11 vs.
 12 SUTTER'S PLACE, INC. dba BAY 101 or
 13 BAY 101 CASINO, et. al.,
 14 Defendants.

Case No. 10-CV-02181 (RMW) (PSG)

**STIPULATION AND
 []
 ORDER TO CONTINUE TRIAL
 DEADLINES RE EXPERT DISCOVERY**

[Fed. R. Civ. P. 35]

Complaint Filed: May 20, 2010

17
 18 On December 12, 2011, the Court issued an Order based upon a December 9, 2011
 19 Stipulation submitted by Plaintiff and Defendant for an independent mental examination of
 20 Plaintiff to take place on January 24, 2012. Plaintiff has just received notice that her appearance
 21 at a Naturalization Oath Ceremony is required on January 24, 2012 to complete her
 22 naturalization process to become a US citizen. To permit Plaintiff to attend the Naturalization
 23 Oath Ceremony, the parties have agreed to continue Plaintiff's IME for three (3) days. In order
 24 to avoid prejudice to Defendant for this brief continuance, the parties have also agreed to
 25 continue the trial deadlines pertaining to expert discovery.

26 Accordingly, Plaintiff, Cuc Dang ("Dang"), and defendant, Sutter's Place, Inc. dba Bay
 27 101 ("Bay 101") (collectively "the parties"), by and through their respective attorneys of record,
 28

1 hereby submit this stipulation and request that the Court allow them a brief continuance of the
2 trial deadlines pertaining to expert discovery, as follows:

EVENT	FORMER DEADLINE	NEW DEADLINE
Last day to disclose experts	Fri. Mar. 16, 2012	Fri. Mar. 23, 2012
Last day to identify rebuttal/opposition experts and serve rebuttal/opposition reports	Fri. Apr. 13, 2012	Fri. Apr. 20, 2012
Close of expert discovery	Tue. May 1, 2012	Tue. May 8, 2012
Last day to file motions on expert discovery	Mon. May 21, 2012	Fri. May 25, 2012

12
13 IT IS SO STIPULATED.

14
15 [In accordance with General Order 45.X.B., Ann Nguyen, counsel for Plaintiff, attests that
16 Defendant's counsel, Matthew Schechter, has concurred in this filing.]

17
18 Dated: January 11, 2012

McMANIS FAULKNER

19
20 /s/

21 MATTHEW SCHECHTER
22 Attorneys for Defendant
SUTTER'S PLACE, INC. dba BAY 101

23 Dated: January 11, 2012

ROBINSON & WOOD, INC.

24
25 /s/

26 ANN A. NGUYEN
27 Attorneys for Plaintiff,
28 CUC DANG

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

ORDER

Good cause appearing therefor, the expert discovery trial deadlines shall be continued as set forth in the above stipulation.

Dated: _____



UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA