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13 Attorneys for Plaintiff  
 IRMA CORONA

14 UNITED STATES DISTRICT COURT

15 IN AND FOR THE NORTHERN DISTRICT OF CALIFORNIA

16 SAN JOSE

17 IRMA CORONA,	)	Case No. CV-10-2611 RMW
	)	
18 Plaintiff,	)	<b>STIPULATED REQUEST TO EXTEND</b>
	)	<b>DEADLINE TO EXCHANGE INITIAL</b>
19 v.	)	<b>DISCLOSURES; DECLARATION OF</b>
	)	<b>ERIC M. LLOYD; <del>PROPOSED</del></b>
20 TARGET CORPORATION,	)	<b>ORDER</b>
	)	
21 Defendant.	)	
	)	
22	)	

23 Pursuant to Local Rule 6-1(b), Plaintiff IRMA CORONA (“Plaintiff”) and Defendant  
 24 TARGET CORPORATION (“Defendant”) (collectively the “Parties”), by and through their  
 25 counsel, stipulate and agree as follows:

26 WHEREAS, Plaintiff’s Complaint was filed in the Superior Court of California for the  
 27 County of Santa Clara on March 30, 2010;

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1 WHEREAS, Defendant removed this case to the United States District Court for the  
2 Northern District of California on June 14, 2010;

3 WHEREAS, Plaintiff filed her First Amended Complaint on June 15, 2010;

4 WHEREAS, Defendant filed a Motion to Dismiss Plaintiff's First Amended Complaint  
5 pursuant to Federal Rule of Civil Procedure 12(b)(6) ("Motion to Dismiss") on June 21, 2010;

6 WHEREAS, on August 13, 2010, this Court granted in part and denied in part  
7 Defendant's Motion to Dismiss, and ordered this matter stayed pending the outcome of  
8 Plaintiff's criminal trial;

9 WHEREAS, Plaintiff was acquitted of all charges on February 10, 2011;

10 WHEREAS, the Court has yet to lift the stay on this action;

11 WHEREAS, Defendant has not filed a responsive pleading to Plaintiff's First Amended  
12 Complaint in light of the stay imposed by the Court, and shall not do so while the stay remains in  
13 effect, absent an order of the Court;

14 WHEREAS, the Parties agree that it is premature to hold their Rule 26(f) conference  
15 prior to the filing of Defendant's responsive pleading in this action;

16 WHEREAS, the Parties agree that it is appropriate to exchange their Initial Disclosures  
17 after Defendant has filed its responsive pleading in this action;

18 WHEREAS, the Court granted the Parties' stipulated requests to continue the Case  
19 Management Conferences previously scheduled for September 16, 2011 and October 28, 2011  
20 due to Plaintiff's counsel's unavailability and the Parties' desire to explore settlement;

21 WHEREAS, the Parties' current deadline to serve their Initial Disclosures is November  
22 11, 2011;

23 NOW THEREFORE, the Parties hereby stipulate and agree to an extension of the  
24 deadline to serve their Initial Disclosures. The Parties agree to serve their Initial Disclosures  
25 within thirty (30) calendar days of the filing of Defendant's responsive pleading in this action.  
26 The Parties further agree that this extension will not alter the date of any other event or any other  
27 deadline already fixed by Court Order.

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**IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.**

DATED: November 9, 2011

Respectfully submitted,  
SEYFARTH SHAW LLP

By           /s/ Laura J. Maechtlen            
Laura J. Maechtlen  
Sarah K. Hamilton  
Eric M. Lloyd  
Attorneys for Defendant  
TARGET CORPORATION

DATED: November 9, 2011

Respectfully submitted,  
LAW OFFICE OF GEORGE G.  
BENETATOS

By           /s/ George G. Benetatos            
George G. Benetatos  
Attorneys for Plaintiff  
IRMA CORONA

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**DECLARATION OF ERIC M. LLOYD**

I, Eric Lloyd, declare as follows:

1. I am an associate with the law firm of Seyfarth Shaw LLP, counsel for Defendant Target Corporation (“Defendant”) in the above-captioned matter. The following is based upon my own personal knowledge and if called upon to testify thereto, I could and would competently do so.

2. On August 13, 2010, the Court granted in part and denied in part Defendant’s Motion to Dismiss Plaintiff’s First Amended Complaint. The Court further ordered this action stayed pending the outcome of Plaintiff’s criminal proceedings in *United States v. Corona*, CR 08-00083PJH. Plaintiff was acquitted on all charges on February 10, 2011.

3. Defendant has not filed a responsive pleading due to the stay ordered by the Court on August 13, 2010.

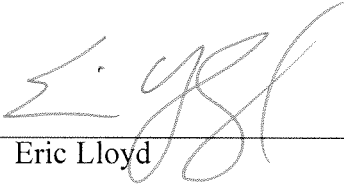
4. On August 26, 2011, the Court noticed a Case Management Conference for September 16, 2011. Thereafter, on September 6, 2011, the parties requested a continuance of the Case Management Conference and all related deadlines to October 28, 2011 due to Plaintiff’s counsel’s unavailability and the parties’ desire to engage in settlement negotiations. The Court granted the parties’ request by Order dated September 14, 2011.

5. On October 19, 2011, the parties requested a continuance of the October 28, 2011 Case Management Conference and all related deadlines to December 2, 2011 due to Plaintiff’s counsel’s unavailability and the parties’ desire to engage in settlement negotiations. The Court granted the parties’ request by Order dated October 26, 2011.

6. Given that the stay has yet to be lifted by the Court, and given that Plaintiff’s counsel was traveling outside of the country between October 23, 2011 and November 2, 2011, the parties met and conferred regarding an extension of the deadline to serve Initial Disclosures between November 4, 2011 and November 7, 2011. As explained in the stipulation filed concurrently herewith, the parties agreed that it would be appropriate to request an extension of the deadline to serve their Initial Disclosures to a date following the filing of Defendant’s

1 responsive pleading in this action. The parties agreed that, subject to Court approval, they would  
2 serve their Initial Disclosures within thirty (30) calendar days of Defendant's filing of a  
3 responsive pleading in this action.

4 I declare under penalty of perjury under the laws of the United States of America that the  
5 foregoing is true and correct, and that this declaration was executed on November 9, 2011 in San  
6 Francisco, California.

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Eric Lloyd

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~~PROPOSED~~ ORDER

GOOD CAUSE APPEARING, it is hereby ORDERED that pursuant to the stipulation of the Parties, the deadline to serve Initial Disclosures in this matter is hereby extended from November 11, 2011. The Parties shall serve their Initial Disclosures within thirty (30) calendar days of the filing of Defendant's responsive pleading in this action.

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

DATED: \_\_\_\_\_, 2011



RONALD M. WHYTE  
UNITED STATES DISTRICT JUDGE