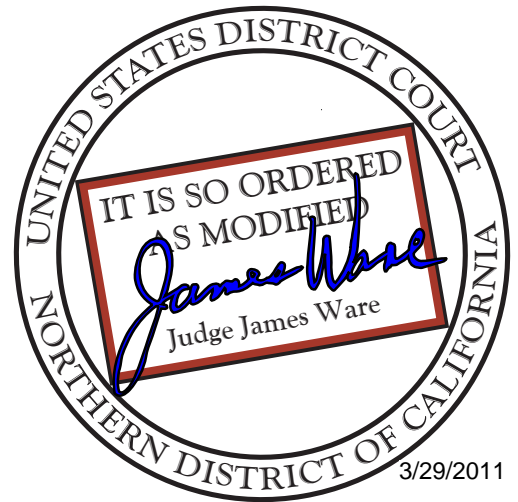


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11 Attorneys for Plaintiff  
 12 KATHY NAVARRO



13 **UNITED STATES DISTRICT COURT**  
 14 **NORTHERN DISTRICT OF CALIFORNIA**

15 KATHY NAVARRO, an individual,  
 16  
 17 Plaintiff,

Case No. C 10-03210 JW

18 v.

**STIPULATION TO EXTEND DISCOVERY  
 DEADLINE AND [PROPOSED] ORDER**

19 ARROW ELECTRONICS, INC., a New York  
 20 corporation; and DOES 1-50, inclusive,  
 21 Defendants.

22  
 23 Defendant Arrow Electronics, Inc. ("Arrow") and Plaintiff Kathy Navarro (collectively  
 24 referred to as "the Parties") jointly state, stipulate and agree as follows:

25 (1) On October 13, 2010, the Court issued a Scheduling Order establishing a discovery  
 26 cut-off date in this matter of April 8, 2010. That same Order established deadlines for Preliminary  
 27 Pretrial Conference on March 7, 2011, submission of Preliminary Pretrial Conference Statements

28 STIPULATION TO EXTEND DISCOVERY DEADLINE  
 AND [PROPOSED] ORDER

Case No. C 10-03210 JW

1 on February 25, 2011, and ADR program coordinator contact of October 29, 2010.

2

3 (2) The Parties timely submitted a Joint Preliminary Pretrial Conference statement on  
4 February 25, 2011.

5

6 (3) On March 3, 2011, the Court entered an Order requiring the Parties to Jointly submit  
7 an updated Preliminary Pretrial Conference Statement on or before March 25, 2011, together with a  
8 proposed Stipulation Extending Deadlines.

8

9 (4) Also on March 3, 2011, Defendant completed the Plaintiff, Kathy Navarro's  
10 deposition.

11

12 (5) The Parties have each exchanged one set of written discovery. The Parties each  
13 anticipate serving at least one additional set of written discovery.

14

15 (6) The Parties anticipate seven additional depositions, which number may be modified  
16 depending on the identification of additional witnesses at deposition. The Parties have met and  
17 conferred regarding the scheduling of these additional depositions.

18

19 (7) The Parties have scheduled a full-day private mediation with Vivienne Williamson  
20 to occur on June 28, 2011.

20

21 In consideration of the above, the Parties jointly request this Court issue an order extending  
22 the deadlines set forth in the Court's October 13, 2010 Order, and establishing the following  
23 deadlines:

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<b>Close of All Discovery</b>	<b>June 27 2011</b>
<b>Last Date for Hearing Dispositive Motions</b> <i>(60 days after Close of All Discovery)</i>	<b>August 29, 2011</b>
<b>Preliminary Pretrial Conference, if necessary</b> <i>(30 days before the Close of All Discovery)</i>	<b>May 23, 2011</b>
<b>Preliminary Pretrial Conference Statements</b> <i>(At least 10 days before conference)</i>	<b>May 13, 2011</b>
<b>Private Mediation</b>	<b>June 28, 2011</b>
<b>Notification to Court Re: Mediation</b>	<b>May 31, 2011</b>

DATED: March 25, 2011

OGLETREE, DEAKINS, NASH, SMOAK &  
STEWART

By: \_\_\_\_\_ /s/ Aaron Roblan  
Aaron Roblan  
Attorneys for Defendant  
ARROW ELECTRONICS, INC.

DATED: March 25, 2011

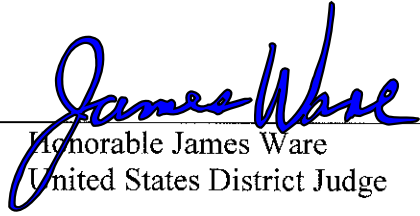
HINKLE, JACHIMOWICZ, POINTER &  
EMANUEL

By: \_\_\_\_\_ /s/ Gerald Emanuel  
Gerald Emanuel  
Attorneys for Plaintiff  
KATHY NAVARRO

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**IT IS SO ORDERED** AS MODIFIED.

Dated: March 29, 2011

  
Honorable James Ware  
United States District Judge