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5 **Attorneys for Plaintiff**

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 8 UNITED STATES DISTRICT COURT
 9 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 10 (San Jose Division)

13 INTERNATIONAL BROTHERHOOD OF
 ELECTRICAL WORKERS UNION, LOCAL
 14 234 ELECTRICAL WORKERS HEALTH &
 WELFARE TRUST FUND; LOCAL 234 OF
 15 THE INTERNATIONAL BROTHERHOOD
 OF ELECTRICAL WORKERS, AFL-CIO;
 16 INTERNATIONAL BROTHERHOOD OF
 ELECTRICAL WORKERS UNION, LOCAL
 17 234 EDUCATIONAL AND TRAINING
 FUND; INTERNATIONAL
 18 BROTHERHOOD OF ELECTRICAL
 WORKERS DISTRICT 9 PENSION PLAN;
 19 and KENNETH SCHERPINSKI, as Trustee
 of Plaintiff Trusts and Business Manager of
 20 Local 234,

21 Plaintiffs,

22 v.

23 WILLIAM CHARLES PORGES, an
 individual, dba ACCELERATED
 ELECTRIC,

24 Defendant.

Case No. 10-CV-5778 EJD

25 **STIPULATION AND [PROPOSED]**
ORDER TO CONTINUE DISCOVERY
CUT-OFF AND RELATED DATES

26 NEYHART,
 ANDERSON,
 FLYNN &
 GROSBOLL
 ATTORNEYS AT LAW

1 Defendant William Charles Porges, dba Accelerated Electric and Plaintiffs stipulate to
2 continue discovery deadlines 30 days while settlement discussions continue. The parties continue
3 to exchange information in an effort to resolve the case prior to trial. The current fact discovery
4 cut off is January 16, 2012. The new fact discovery cut off will be February 16, 2012. The current
5 expert discovery cut off is February 6, 2012. The new expert discovery cut off will be March 6,
6 2012. The current deadline for filing dispositive motions is February 20, 2012. The new deadline
7 for filing dispositive motions is March 20, 2012. This is the second extension of the discovery
8 deadlines.
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10 IT IS SO STIPULATED.

12 DATED: January 6, 2012

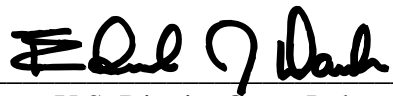
MARKS, FINCH, THORNTON & BAIRD,
LLP
By: /s/Chad T. Wishchuk
CHAD T. WISHCHUK
Attorneys for Defendant William Charles
Porges, dba Accelerated Electric

17 DATED: January 6, 2012

NEYHART, ANDERSON, FLYNN &
GROSBOLL
By: /s/Chloe I. Quail
CHLOE I. QUAIL
Attorneys for Plaintiffs

22 IT IS SO ORDERED.

23 DATE: January 10, 2012



U.S. District Court Judge
Edward J. Davila

NEYHART,
ANDERSON,
FLYNN &
GROSBOLL
ATTORNEYS AT LAW

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