



1           Whereas, Defendant was unable to produce its two Wal-Mart persons most  
2 knowledgeable for deposition by the Court ordered deadline of February 25, 2012. Defendant's  
3 PMKs work at Wal-Mart's headquarters in Bentonville, Arkansas, and the parties have been  
4 meeting and conferring concerning the date, location and method of the deposition and  
5 responsibility for costs of same and believe they will be able to resolve these issues.

6           Whereas, Defendant would like to avoid incurring additional time and fees on discovery  
7 that could be unnecessary if the matter is settled at the mediation;

8           Therefore, it is hereby stipulated, by and between the parties, through their counsel of  
9 record, that the expert discovery cut-off may be extended to March 27, and that Wal-Mart's two  
10 PMKs shall be produced by that same date (without plaintiff waiving any argument that they  
11 should have been produced sooner pursuant to the court's deadline).

12 Dated: March 1, 2012

GORDON & REES LLP

14 By: /s/Michael A. Laurensen

15 Michael D. Bruno  
16 Michael A. Laurensen  
Attorneys for Defendant  
WAL-MART STORES, INC.

17 Dated: March 1, 2012

LAW OFFICE OF RICHARD J.  
VAZNAUGH

20 By: /s/Richard J. Vaznaugh

21 Richard J. Vaznaugh  
Attorney for Plaintiff  
22 ROSALIND LOPEZ

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1 Good cause appearing therefore based on the above stipulation of the parties, the expert  
2 discovery cut-off is extended to March 27 and Parties shall conclude meet and confer and conclude  
3 ~~proceed with~~ the PMK depositions no later than March 27, 2012. Any objection by Plaintiff that  
4 Defendant should have produced its two PMKs by the earlier deadline is hereby preserved.  
5  
6

7 IT IS SO ORDERED.  
8

9  
10 Dated: March 6, 2012

  
Lucy H. Koh, United States District Judge