lart St	ores, inc	Do	
1	RICHARD J. VAZNAUGH (SBN: 173249)		
2	LAW OFFICE OF RICHARD J. VAZNAUGH 1388 Sutter St., Ste 1000		
3	San Francisco, CA 94109 Telephone: 415-593-0076		
4	Facsimile: 415-673-5606 richvaz@cajoblaw.com		
5	Attorney for Plaintiff ROSALIND LOPEZ		
6 7	MICHAEL D. BRUNO (SBN: 166805)		
8	MICHAEL A. LAURENSON (SBN: 190023) GORDON & REES LLP 275 Battery Street, Suite 2000		
9	San Francisco, CA 94111 Telephone: (415) 986-5900		
10	Facsimile: (415) 986-8054 mbruno@gordonrees.com		
11	mlaurenson@gordonrees.com Attorneys for Defendant		
12	WAL-MART STORES, INC.		
13			
14	UNITED STATES DISTRICT COURT		
15	NORTHERN DISTRICT OF CALIFORNIA		
16	SAN JOSE DIVISION		
17	ROSALIND LOPEZ,	CASE NO. CV11-01632 LHK PSG	
18	Plaintiff,	JOINT REQUEST FOR FURTHER CONTINUANCE OF PRETRIAL	
19	VS.	DEADLINES AND PROPOSED ORDER	
20	WAL-MART STORES, INC. and DOES 1-20, inclusive.		
21	Defendant.		
22			
23	The modical base well as it is if and more in a		
24	The parties have made significant progress in working out the details of the settlement,		
25	which are complicated due to the fact that part of the settlement payment will be made by way of		
26 27	a structured settlement. The parties anticipate being able to reach agreement on all terms, but		
28	request additional time to complete the settlement and file a stipulation of dismissal.		
20	-1-		
	JOINT REQUEST FOR FURTHER CONTINUANCE OF PRETRIAL DEADLINES CASE NO. CV11-01632 LHK		
	•	Dockets.Justia	

1	Accordingly, because the settlement is progressing successfully but requires additional	
2	time and due diligence due to the structure, and both parties wish to avoid the cost of	
3	unnecessary trial preparation, the parties have stipulated and jointly request the following:	
4	1) That the deadline for filing a stipulation of dismissal be extended to April 30, 2012;	
5	2) That the pretrial conference be continued approximately one week to	
6	and the date for oppositions to MILs and the due date for filing jury	
7	instructions, verdict forms, and proposed voir dire will now be on May 2, 2012; Or ,	
8	in the alternative, that the current pretrial conference date be maintained and that,	
9	oppositions to MILs and the due date for filing jury instructions, verdict forms, and	
10	proposed voir dire be extended to May 1, 2012.	
11	Dated: April 26, 2012 GORDON & REES LLP	
12		
13	By: /s/Michael A. Laurenson Michael D. Bruno	
14	Michael A. Laurenson	
15	Attorneys for Defendant WAL-MART STORES, INC.	
16	Dated: April 26, 2012 LAW OFFICE OF RICHARD J.	
17	VAZNAUGH	
18		
19	By: <u>/s/ Richard J. Vaznaugh</u> Richard J. Vaznaugh	
20	Attorney for Plaintiff ROSALIND LOPEZ	
21	The parties shall file their stipulation of dismissal by April 30, 2012. The pretrial conference remains as set for May 2, 2012. Oppositions to MILs and the due date for filing jury instructions, verdict forms, and proposed voir dire is extended to May 1, 2012.	
22		
23	IT IS SO ORDERED.	
24	Dated: April 26, 2012 The Hon Hucy Koh	
25	United States District Court Judge	
26		
27		
28		