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5	Attorneys for Defendant WALGREEN CO.
6	WALGREEN CO.
7	UNITED STATES DISTRICT COURT
8	NORTHERN DISTRICT OF CALIFORNIA
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10	ROSARIO ALONSO, an individual, Case No. 5:12-CV-06269-HRL
11	Plaintiff, ) STIPULATION AND [PROPOSED] ORDER
12	V. ) REGARDING EXPERT DISCOVERY
13	WALGREEN CO., and DOES 1 – 50, inclusive,
14	Defendants.
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18	I. STIPULATION
19	The parties hereto, through their undersigned counsel of record, hereby stipulate as follows:
20	1. The current cut-off date for expert discovery is November 22, 2013;
21	2. Walgreen Co. ("Walgreens") is in the process of preparing, and will be filing, a
22	motion for summary judgment and/or summary adjudication;
23	3. In order to proceed efficiently and cost-effectively with litigation, the parties agree
24	that the depositions of Plaintiff's retained and non-retained experts, Ann Marie
25	Noel and Dr. Shabi Kahn, may take place, if necessary, after the Court rules on
26	Walgreen's motion for summary judgment and/or summary adjudication.
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	STIPULATION AND [ <del>PROPOSED]</del> ORDER REGARDING EXPERT DISCOVERY

1	4. The parties agree that under any circumstances, the depositions of Plaintiff's
2	experts, if necessary, will take place prior to January 31, 2014, well in advance of February
3	the Pretrial Conference in this case currently set for March 11, 2014.
4	DATED: 0.4-110.2012
5	DATED: October 18, 2013
6	By Rex Barrell Berry
7	Attorneys for Defendant Walgreen Co.
8	Transferr Co.
9	DATED: October 18, 2013
10	By / //
11	Lawrence A. Grgan Attorneys for Plaintiff
12	Rosatio Alonzo
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14	W. ADDED INDARACEDI
15	II. ORDER [PROPOSED]
16	Based on the foregoing stipulation of the parties, and for good cause shown, IT IS
17	HEREBY ORDERED:
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19	The depositions of Plaintiff's retained and non-retained experts, Ms. Ann Marie Noel and
20	Dr. Shabi Kahn, may take place, if necessary, following the close of expert discovery on 29
21	November 22, 2013, but will be completed on or before January 15, 2014.
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23	DATED: October 18, 2013
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25	By
26	Howard R. Lloyd United States Magistrate Judge
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