

1 David Roth (State Bar No. 194648)
dvr@manningllp.com
 2 Miriam Renzi (State Bar No. 281888)
mor@manningllp.com
 3 **MANNING & KASS**
 4 **ELLROD, RAMIREZ, TRESTER LLP**
 121 Spear Street, Suite 200
 5 San Francisco, California 94105-1582
 Telephone: (415) 217-6990
 6 Facsimile: (415) 217-6999

7 Attorneys for
 8 MACY'S WEST STORES, INC.

9 **UNITED STATES DISTRICT COURT**
 10 **NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION**

MANNING & KASS
 ELLROD, RAMIREZ, TRESTER LLP
ATTORNEYS AT LAW

12 GAYLE TURNER, et al.,,

13 Plaintiff,

14 v.

15 INNOVATIVE FACILITY
 16 SERVICES, LLC, et al.,,

17 Defendant.

Case No. 14-cv-00544-BLF

**STIPULATION AND ~~PROPOSED~~
 ORDER FOR DISCOVERY
 SCHEDULE**

The Hon. Beth Labson Freeman

18 Per Case Management Order dated May 22, 2014 and signed by the Hon.
 19 Beth Labson Freeman, the parties hereby stipulate to the following discovery
 20 schedule:

EVENT	DATE OR DEADLINE
Further Case Management Conference	
Mediation	09/23/2014
Last Day to Amend Pleadings or Add Parties	11/28/2014
Last Day to Disclose Experts	11/28/2014
Fact Discovery Cut-Off	10/31/2014
Expert Discovery Cut-Off	11/28/2014
Last Day to Hear Dispositive Motions	01/30/2015
Final Pretrial Conference/Motions in	03/05/2015 at 2:30 pm

1	Limine	
2	Trial	03/16/2015 at 9:00 am

3 DATED: July 18, 2014

**MANNING & KASS
ELLROD, RAMIREZ, TRESTER LLP**

7 By: /s/David Roth
8 David Roth
9 Miriam Renzi
10 Attorneys for Defendant, MACY'S WEST
11 STORES, INC.

12 DATED: July 18, 2014

**DREYER, BABICH, BUCCOLA, WOOD,
CAMPORA, LLP**

16 By: /s/Joseph Yates
17 Joseph Yates
18 Attorneys for Plaintiff, GAYLE TURNER
19 and TOM TURNER

20 DATED: July 18, 2014

**WILSON, ELSER, MOSKOWITZ,
EDELMAN & DICKER, LLP**

23 By: /s/Eric Wong
24 Eric Wong
25 Attorneys for Defendant, INNOVATIVE
26 FACILITY SERVICES, LLC.

MANNING & KASS
ELLROD, RAMIREZ, TRESTER LLP
ATTORNEYS AT LAW

1 ~~PROPOSED~~ ORDER

- 2 The parties' stipulation is adopted and IT IS SO ORDERED.
- 3
- 4 The parties' stipulation is modified as follows, and IT IS SO ORDERED.
- 5
- 6

7 Dated: July 21, 2014


 8 HONORABLE BETH LABSON FREEMAN

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 MANNING & KASS
 ELLROD, RAMIREZ, TRESTER LLP
ATTORNEYS AT LAW

PROOF OF SERVICE

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STATE OF CALIFORNIA, COUNTY OF SAN FRANCISCO

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of San Francisco, State of California. My business address is 121 Spear Street, Suite 200, San Francisco, CA 94105-1582.

On the date set forth below, I served true copies of the following document(s) described as **STIPULATION AND [PROPOSED] ORDER FOR DISCOVERY SCHEDULE** on the interested parties in this action as follows:

SEE ATTACHED SERVICE LIST

BY MAIL: I enclosed the document(s) in a sealed envelope or package addressed to the persons at the addresses listed in the Service List and placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with the practice of Manning & Kass, Ellrod, Ramirez, Trester LLP for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid. I am a resident or employed in the county where the mailing occurred. The envelope was placed in the mail at San Francisco, California.

BY CM/ECF NOTICE OF ELECTRONIC FILING: I electronically filed the document(s) with the Clerk of the Court by using the CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system. Participants in the case who are not registered CM/ECF users will be served by mail or by other means permitted by the court rules.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on July ~~18~~, 2014, at San Francisco, California.


Mary A. Trubiano

MANNING & KASS
ELLROD, RAMIREZ, TRESTER LLP
An Attorney at Law

SERVICE LIST

Gayle Turner v. Innovative Facility Services, Macy's West Stores, et al.

Case No. 14-cv-00544-BLF **14-cv-00544**

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Joseph R. Yates, Esq.
Dreyer Babich Buccola Wood Campora,
LLP
20 Bicentennial Circle
Sacramento, CA 95826

Attorney for Plaintiffs

Tel: 916-379-3500
Fax: 916-379-3599

Eric Wong, Esq.
Wilson Elser Moskowitz Edelman &
Dicker LLP
525 Market Street, 17th Floor
San Francisco, CA 94105-2725
eric.wong@wilsonelser.com

**Attorneys for Defendant
Innovative Facility Services, LLC**

Tel: 415-625-9271 (Direct)
415-433-0990 (Main)
Fax: 415-434-1370

MANNING & KASS
ELLROD, RAMIREZ, TRESTER LLP
Attorneys at Law