

1 WHEREAS, on January 25, 2017, the Parties filed their Joint Case Management
2 Statement setting forth discovery cut-off dates [Dkt. 19]; and

3 WHEREAS, on March 31, 2017 this Court issued an Order setting forth the requested
4 discovery cut-offs, including ordering that fact discovery was to be completed by January 1,
5 2018 [Dkt. 25]; and

6 WHEREAS, on November 22, 2017, the parties filed a Joint Stipulation asking the Court
7 to appoint a Court-sponsored mediator [Dkt. 43]; and

8 WHEREAS, the parties have diligently been pursuing discovery, including propounding
9 and responding to requests to produce, requests to admit, interrogatories, and issuing deposition
10 notices for Plaintiff Saeed Yousuf and Defendant witnesses Robert Bothman and John Fox; and

11 WHEREAS, on November 28, 2017, the Court issued an order appointing W. George
12 Wailes as mediator [Dkt. 45]; and

13 WHEREAS, no trial date is currently on calendar [Dkt. 25];

14 THEREFORE, in order to reduce potential litigation costs and allow mediation to occur
15 before depositions move forward, the Parties hereby stipulate as follows:

16 [1.] The Court shall issue a Stipulated Order allowing the parties to take the currently
17 noticed depositions of Saeed Yousuf, Robert Bothman, and John Fox after the close of discovery
18 after mediation in front of W. George Wailes is concluded;

19 [2.] The current Fact Discovery Cutoff of January 1, 2018 shall remain intact.

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21 Dated: December 1, 2017

/s/ Amy Carlson

Amy Carlson, Esq.
EMPLOYMENT RIGHTS ATTORNEYS, LLP
Counsel for Plaintiff

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25 Dated: December 1, 2017

/s/ Christopher W. Loweth

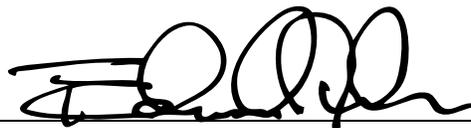
John C. Fox, Esq.
Alexa Morgan, Esq.
Christopher W. Loweth, Esq.
FOX, WANG & MORGAN P.C.
Counsel for Defendants

1 [PROPOSED] ORDER

2 Counsel for the Parties in the above-captioned action submitted a Joint Stipulation to
3 allow the currently noticed depositions of Saeed Yousuf, Robert Bothman, and John Fox to go
4 forward after the close of fact discovery, currently set for January 1, 2018, pending completion
5 of mediation. All other dates, including the January 1, 2018 close of discovery, set by this
6 Court's Case Management Order of March 31, 2017 shall remain. [In addition, the Court makes
7 the further orders stated below:]
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11 IT IS SO ORDERED.

12 Dated: December 4, 2017



13 UNITED STATES DISTRICT JUDGE
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1 **CERTIFICATE OF SERVICE**

2 I hereby certify that I electronically filed the foregoing STIPULATION & [PROPOSED]
3 ORDER EXTENDING TIME TO COMPLETE NOTICED DEPOSITIONS with the Clerk of
4 the Court for the United States District Court for the Northern District of California using the
5 CM/ECF system on December 1, 2017.

6 I certify that all participants in the case are registered CM/ECF users and that service will
7 be accomplished by the CM/ECF system, which sends notifications of such filing via electronic
8 mail to all counsel of record.

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10 Dated: December 1, 2017

11 /s/ Christopher W. Loweth

12 Christopher W. Loweth
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