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26 Attorneys for Plaintiff,
27 **TARA FARRELL**

28 TARA FARRELL,

Plaintiff,

v.

AT&T CORP., ERIC HERKENRATH,
AT&T MOBILITY LLC, and
DOES 2 through 50, Inclusive,

Defendants.

Case No.: 2:08-CV-01074-MCE-EFB

Honorable Morrison C. England, Jr.

**STIPULATION OF COUNSEL TO
CONTINUE 1) DISCOVERY CUT-OFF
AND 2) DISPOSITIVE MOTION
HEARING CUT-OFF; ORDER**

Trial date: February 22, 2010
Time: 9:00 a.m.

STIPULATION RE CONTINUANCE OF DISCOVERY
CUT-OFF AND DISPOSITIVE MOTION CUT-OFF

STIPULATION

By and through their attorneys of record, Plaintiff Tara Farrell (“Plaintiff”) and Defendant AT&T Mobility LLC (“AT&T”), hereafter referred to as the “Parties,” hereby agree and stipulate as follows:

WHEREAS, Plaintiff filed her Complaint in the above-captioned matter on or about March 13, 2008, and trial is presently set for February 22, 2010;

WHEREAS, the Court entered a Pretrial (Status) Scheduling Order (the "Order") on or about August 25, 2008;

WHEREAS, the Order set the discovery cut-off date in this action for April 24, 2009;

WHEREAS, the Order established August 24, 2009 as the last day that dispositive motions in this matter may be heard;

WHEREAS, good cause exists to continue the discovery and dispositive motion hearing cut-off dates because the Parties have been and are currently involved in good faith settlement discussions which is only possible if further significant costs are not expended by both sides;

WHEREAS, the Parties have already participated in some discovery, including written discovery, document production, and depositions, but wish to postpone further discovery while settlement discussions are ongoing in an effort to reduce costs incurred;

WHEREAS, the Parties have not requested any previous continuance of motion, pre-trial, or trial dates;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED TO by and between the Parties, and by and through their respective attorneys of record, that the discovery cut-off date is continued to May 27, 2009 and that the dispositive motion hearing cut-off date is continued to September 23, 2009 for the

1 sole purpose of providing the Parties with additional time to settle this matter without
2 incurring additional costs.

3 IT IS SO STIPULATED.

4 DATED: April 6, 2009

5 JESSE M. JAUREGUI
6 DEBORAH YOON JONES
7 SAYAKA KARITANI
8 ADRIENE PLESCIA LYNCH
9 **ALSTON & BIRD LLP**

10

/s/ Deborah Yoon Jones
11 Deborah Yoon Jones

12 Attorneys for Defendant
13 **AT&T MOBILITY LLC**

14 DATED: April __, 2009

15 ROBERT C. BOWMAN JR.
16 CHRISTOPHER C. PHILLIPS
17 **LAW OFFICE OF BOWMAN & ASSOCIATES**

18

Christopher Phillips
19 Attorneys for Plaintiff
20 **TARA FARRELL**

21 **ORDER**

22 IT IS SO ORDERED.

23 DATED: April 14, 2009

24 
25 MORRISON C. ENGLAND, JR
26 UNITED STATES DISTRICT JUDGE