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Attorneys for Plaintiff,
TARA FARRELL

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

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

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

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

IT IS SO STIPULATED.

DATED: April 6, 2009

JESSE M. JAUREGUI
DEBORAH YOON JONES
SAYAKA KARITANI
ADRIENE PLESCIA LYNCH
ALSTON & BIRD LLP

/s/ Deborah Yoon Jones

Deborah Yoon Jones

Attorneys for Defendant
AT&T MOBILITY LLC

DATED: April __, 2009

ROBERT C. BOWMAN JR.
CHRISTOPHER C. PHILLIPS
LAW OFFICE OF BOWMAN & ASSOCIATES

Christopher Phillips

Attorneys for Plaintiff
TARA FARRELL

ORDER

IT IS SO ORDERED.

DATED: April 14, 2009


MORRISON C. ENGLAND, JR.
UNITED STATES DISTRICT JUDGE