W. Lee Smith, S.B.N. 196115
lsmith@michellawyers.com
Scott M. Franklin, S.B.N. 240254
sfranklin@michellawyers.com
MICHEL & ASSOCIATES, P.C.
180 E. Ocean Blvd., Suite 200
Long Beach, CA 90802
Telephone: (562) 216-4444
Facsimile: (562) 216-4445

Attorneys for Defendant San Gabriel Valley Gun Club

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

CALMAT CO. dba VULCAN MATERIALS COMPANY, WESTERN DIVISION, a Delaware Corporation, Plaintiff, v. SAN GABRIEL VALLEY GUN CLUB, a non-profit California Corporation, and DOES 1 through 10, inclusive, Defendants.	CASE NO: EDCV08-1198 WHS (OPx) **STIPULATION TO EXTEND PRETRIAL DATES** *Pursuant to* Fed. R. Civ. P. 16(b)(4) and L.R. 16-14

The parties, Plaintiff Co. dba Vulcan Materials Co., Western Division ("Plaintiff") and Defendant San Gabriel Valley Gun Club ("Defendant") (collectively the "Parties"), through their respective attorneys of record, hereby move the Court to reschedule certain dates set by this Court in the Order of July 30, 2010 (Docket Document 39 herein).

WHEREAS, Plaintiff filed its Complaint on September 4, 2008;

WHEREAS, the Order of July 30, 2010, set the following deadlines:

1. Expert Discovery shall be completed by January 15, 2011; and

2. Dispositive Motions, if any, shall be filed by January 31, 2011.

WHEREAS, the parties voluntarily engaged in a mediation session with a private mediator on December 20, 2010. Though the mediation session did not result in this action being resolved, the parties agree the session was useful in clarifying each of the parties' arguments, and establishing a framework for further mediation.

WHEREAS, the Parties wish to engage in a second voluntary mediation session with the same mediator used on December 20, 2010, at some point within the next 40 days, i.e., before February 1, 2011 (and thus before the February 3, 2011, mandatory Settlement Conference before Magistrate Judge Oswald Parada).

WHEREAS, the Parties agree that it is reasonable to briefly (i.e., forty-five days) defer the cost and time required to comply with the relevant expert discovery and dispositive motion deadlines so the Parties may continue to mediate this matter with a private mediator.

WHEREAS, the Parties do not believe the extensions requested will operate a prejudice to either of them, and that the extensions are in the interests of justice and judicial efficiency.

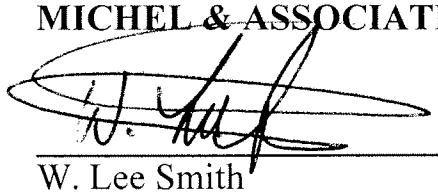
NOW, THEREFORE, BASED ON THE FOREGOING FACTS, THE PARTIES HEREBY STIPULATE AND MOVE TO COURT FOR ORDER RESETTING THE FOLLOWING DEADLINES:

1.	Last Day to Conduct Expert Discovery	March 1, 2011 (was January 15, 2011);
2.	Last Day to File Dispositive Motions	March 17, 2011 (was January 31, 2011);

IT IS SO STIPULATED AND AGREED.

Dated: December 27, 2010

MICHEL & ASSOCIATES, L.P.



W. Lee Smith
Attorney for Defendant San Gabriel Valley Gun Club

Dated: December 27, 2010

JEFFER MANGELS BUTLER & MARAMO LLP

Paul Kroeger
Attorney for Plaintiff Calmat Co. dba Vulcan Materials Co., Western Division

IT IS SO STIPULATED AND AGREED.

Dated: December 27, 2010

MICHEL & ASSOCIATES, L.P.

W. Lee Smith
Attorney for Defendant San Gabriel Valley Gun Club

Dated: December 27, 2010

JEFFER MANGELS BUTLER & ~~MARAMO~~ LLP

Mitchell

Paul Kroeger
Attorney for Plaintiff Calmat Co. dba Vulcan Materials Co., Western Division

PROOF OF SERVICE

IT IS HEREBY CERTIFIED THAT:

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 180 E. Ocean Blvd., Suite 200, Long Beach, California, 90802.

I am not a party to the above-entitled action. I have caused service of:

STIPULATION TO EXTEND PRETRIAL DATES

on the following party by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which electronically notifies them.

Kenneth A. Ehrlich
kehrlich@jmbm.com
Paul A. Kroeger
pkroeger@jmbm.com
JEFFER MANGELS BUTLER & MARAMO LLP
1900 Avenue of the Stars, 7th Floor
Los Angeles, CA 90067

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

Executed on December 27, 2010.

/S/
Christina Sanchez