BINGHAM MCCUTCHEN LLP
WARREN E. GEORGE (SBN 53588)
MANU PRADHAN (SBN 253026)
Three Embarcadero Center
San Francisco, CA 94111-4067
Telephone: 415.393.2000
Facsimile: 415.393.2286
warren.george@bingham.com
manu.pradhan@bingham.com

Attorneys for Plaintiffs Maria del Rosario Corona and Andres Santana

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

MARIA DEL ROSARIO CORONA, AS HEIR OF THE ESTATE OF OSCAR CRUZ, et. al.,

Plaintiffs,

v.

KELLY HARRINGTON, et al.,

Defendants.

Case No. 1:08-CV-00237-LJO-DLB

STIPULATION REGARDING SCHEDULING ORDER; ORDER

STIPULATION

Pursuant to Fed. R. Civ. Proc. 16(b)(4), the parties stipulate to an extension of the deadlines in the Scheduling Order issued on June 30, 2011 (Docket Item # 97).

Defendants require additional time to complete their document production. Declaration Of Manu Pradhan In Support Of Stipulation Regarding Scheduling Order ("Pradhan Decl."), ¶¶ 3-4. Progress has also been delayed because the parties are negotiating a Protective Order to facilitate the production of documents Defendants will not otherwise produce based on their claims of confidentiality. Pradhan Decl., ¶ 5. Other discovery issues have arisen that are delaying the case, and though the parties are continuing to meet and confer regarding those issues, some motion practice is likely. Pradhan Decl., ¶ 4.

The parties have discussed how these issues affect the case schedule. Pradhan Decl., ¶¶ 6-7. Subject to the availability of the Court, the parties jointly request that the Court amend the Scheduling Order to reflect the following dates:

Event	**Current Date**	**New Dates Ordered By Court**
Filing of Stipulation or Motions Amending Pleadings	October 7, 2011	January 5, 2012
Settlement Conference	November 30, 2011, 10:00 a.m., Courtroom 9	**Parties to contact Magistrate Judge for acceptable date.**
Non- Expert Discovery	December 2, 2011	March 1, 2012
Expert Discovery	February 3, 2012	May 3, 2012
Filing of Non-Dispositive Motion:	February 15, 2012	May 15, 2012
Hearing re Non-Dispositive Motion	March 9, 2012	June 7, 2012
Filing of Dispositive Motion:	April 20, 2012	**June 29, 2012**
Hearing re Dispositive Motion	June 5, 2012	**August 15, 2012**

Event	Current Date	New Dates Ordered By Court
Pre-Trial Conference	July 17, 2012, 8:30 a.m., Courtroom 4	October 15, 2012 **at 8:30 a.m.**
Trial	September 10, 2012, 8:30 a.m., Courtroom 4 JT 5 days	December 10, 2012 **at 8:30 a.m.**

DATE: October 6, 2011

BINGHAM MCCUTCHEN LLP

By: /s/
Manu Pradhan
Attorneys for Plaintiffs

DATE: October 6, 2011

ATTORNEY GENERAL OF THE STATE OF CALIFORNIA

By: /s/
Kelli M. Hammond
Attorney for Defendants

ORDER

GOOD CAUSE showing, the dates are modified as reflected above and with dates in bold different than those requested by the parties' stipulation.

IT IS SO ORDERED.

Dated: **October 6, 2011**

/s/ Lawrence J. O'Neill
UNITED STATES DISTRICT JUDGE