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13 Attorneys for Defendants

14 UNITED STATES DISTRICT COURT

15 NORTHERN DISTRICT OF CALIFORNIA: SAN FRANCISCO DIVISION

16 AMERICAN COUNCIL OF THE BLIND, a  
 District of Columbia non-profit corporation,  
 17 SCARLETT MILES, MARVELENA  
 18 QUESADA, ARLENE DOHERTY, ALICE  
 MARJORIE DONOVAN, BILLIE JEAN  
 19 KEITH, GEORGE P. SMITH, MARY ANN  
 ALEXANDER, AND LAURA M. RUSSELL on  
 20 behalf of themselves and all others similarly  
 21 situated,

22 Plaintiffs,

23 vs.

24 MICHAEL ASTRUE, Commissioner of the  
 Social Security Administration, in his official  
 25 capacity, and SOCIAL SECURITY  
 ADMINISTRATION,  
 26

27 Defendants.

Case No. C 05-04696 WHA

CLASS ACTION

**STIPULATION AND ~~PROPOSED~~ ORDER  
TO AMEND THE FACT DISCOVERY CUT-  
OFF DATE UNDER THE CASE  
MANAGEMENT ORDER**

**STIPULATION**

1  
2 WHEREAS Plaintiffs and Defendants are working together on scheduling and completing the  
3 remaining four depositions of Defendants pursuant to Rule 30(b)(6) of the Federal Rules of Civil  
4 Procedure and Plaintiffs' pending Requests for Inspection;

5 WHEREAS the current cut-off date for fact discovery is Tuesday, March 31, 2009,

6 WHEREAS to facilitate scheduling, the parties would like to have the entire work week  
7 beginning March 30, 2009 within which to conduct the remaining depositions, and until April 7, 2009  
8 to prepare for and conduct the inspections;

9 ACCORDINGLY, pursuant to Civil Local Rules 6-1(b) and 6-2(a), the parties through their  
10 respective attorneys of record hereby stipulate to, and respectfully propose that this Court adopt, a one  
11 week extension of the close of fact discovery as set forth in the Revised Case Management Order  
12 (Docket No. 148) from Tuesday, March 31, 2009 to Tuesday, April 7, 2009, for the limited purposes  
13 set forth hereunder. The parties agree that the close of fact discovery for all other matters will remain  
14 on March 31.

15 The parties agree that the extension of the date for close of fact discovery to April 3, 2009 is for  
16 the limited purpose of completing the Rule 30(b)(6) depositions of Defendants and the extension of the  
17 date for close of fact discovery to April 7, 2009 is for the limited purpose of completing Plaintiffs'  
18 requests for inspection.

19 All other dates under the Federal Rules of Civil Procedure and the Case Management Order  
20 shall not be affected by this amendment.

21 This Court previously issued an order (Docket No. 148) on December 12, 2009 granting the  
22 parties' joint motion to amend the case management schedule set forth on February 29, 2008 (Docket  
23 Nos. 59) as follows: the non-expert discovery cut-off date was amended to March 31, 2009; the last  
24 date for designation of expert testimony and disclosure of full expert reports was amended to March  
25 31, 2009; the last date to file dispositive motions was amended to June 15, 2009; the date of the final  
26 pretrial conference was amended to August 24, 2009; and the first date of bench trial was amended to

1 September 8, 2009. On January 23, 2009, the Court issued an order amending the last date to file  
2 dispositive motions to June 18, 2009 (Docket No. 152).

3  
4 Dated: March 26, 2009

By: /s/ Marilee C. Wang  
Marilee C. Wang

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1950 University Avenue, 4th Floor  
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9 Attorneys for Plaintiffs

10 Dated: March 26, 2009

By: /s/ Scott Risner

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15 Attorneys for Defendants

16  
17 **ORDER**

18 Pursuant to the parties' stipulation, and for good cause appearing, it is SO ORDERED.

19 Dated: March 27, 2009

20  
21  
22 Honorable  
23 United States District Judge  
24  
25  
26  
27  
28



**Filer's Attestation**

I, Scott Risner, am the ECF User whose identification and password are being used to file this Stipulation to Amend the Joint Case Management Statement. Pursuant to General Order No. 45, § X(B), I attest under penalty of perjury that concurrence in the filing of the document has been obtained from Marilee C. Wang.

Dated: March 26, 2009

By: /s/ Scott Risner