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8
 9 UNITED STATES DISTRICT COURT
 10 NORTHERN DISTRICT OF CALIFORNIA
 11 SAN FRANCISCO DIVISION

12 JANE DOE and MARY ROE,)
)
 13 Plaintiffs,)
)
 14 v.)
)
 15 GENERAL MICHAEL W. HAGEE,)
 Commandant of the U.S. Marine Corps,)
 16 THE U.S. MARINE CORPS, DONALD C.)
 WINTER, Secretary of the Navy, THE U.S.)
 17 NAVY, BRIAN FUKUSHIMA, JOSEPH)
 DUNZWEILER, and DOES 1-10,)
 18)
 Defendants.)
 19)

No. C 06-01777 MHP
E-FILING CASE

**STIPULATION AND ~~PROPOSED~~
 ORDER REQUESTING
 CONTINUANCE OF DISPOSITIVE
 MOTION DATES AND SOME
 DISCOVERY MATTERS**

20
 21 The parties stipulate and respectfully request the Court to continue the dispositive motion
 22 briefing and hearing dates by two weeks, and to allow plaintiffs to take two depositions – of
 23 Special Agent Kevin Toevs and Major Doug Alexander – after the fact discovery cutoff, if they
 24 choose to.

25 The reasons for defendants’ request to change the dispositive motion schedule are (1)
 26 defendants’ counsel has just been assigned to a trial beginning on July 9, which is the current
 27 dispositive motion hearing date; (2) the parties have a settlement conference set for next
 28 Wednesday, which could render further proceedings moot; and (3) the deposition of one plaintiff

1 will not take place until the day before or after the settlement conference, which means that the
2 deposition transcript would not be available for the motion. The reason for plaintiffs' request to
3 take two depositions after the fact discovery cut-off is that both depositions require travel to the
4 Washington, D.C. area, and the expense and time that these depositions will cost might be saved
5 if the settlement conference is successful.

6 So stipulated and respectfully submitted,
7 For the Federal Defendants.

8 SCOTT N. SCHOOLS
9 United States Attorney

10 Dated: May 21, 2007

/s/

11 OWEN P. MARTIKAN
12 Assistant United States Attorney

13 For the Plaintiffs.

14
15 Dated: May 21, 2007

/s/

16 MICHAEL S. SORGEN
17 Attorneys for Plaintiffs

18 ~~[PROPOSED]~~ ORDER

19 Pursuant to stipulation and for good cause shown, dispositive motions shall be filed by
20 June 15, 2007, oppositions shall be filed by July 2, 2007, replies shall be filed by July 9, 2007,
21 and the hearing shall take place on July 23, 2007 at 2:00pm. The depositions of Special Agent
22 Kevin Toevs and Major Doug Alexander may take place after the fact discovery cutoff. at a date set
23 by the court at the July 23, 2007 hearing.

SO ORDERED.

24 Dated: May 23, 2007

