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22 UNITED STATES DISTRICT COURT
 23 NORTHERN DISTRICT OF CALIFORNIA
 24 SAN FRANCISCO DIVISION

25 TERRENCE DAVIS,)
 26)
 27 Plaintiff,)
 28)
 29 v.)
 30)
 31 MICHAEL J. ASTRUE, Commissioner of)
 32 the Social Security Administration,)
 33)
 34 Defendant.)
 35)

No. C 06-6108 EMC & No. C 09-980 EMC
**STIPULATION AND [PROPOSED]
 ORDER EXTENDING FACT AND
 EXPERT DISCOVERY DEADLINES**
 Hon. Edward M. Chen

36 JOHN DOE,)
 37)
 38 Plaintiff,)
 39)
 40 v.)
 41)
 42 MICHAEL J. ASTRUE, Commissioner of)
 43 the Social Security Administration,)
 44)
 45 Defendant.)
 46)

1 The parties stipulate to the following, subject to the Court's approval. On March 16,
2 2012, the Court ordered that fact discovery be completed by June 8, 2012 and that expert
3 discovery be completed by August 10, 2012. See Davis Docket No. 328. The parties have been
4 conducting discovery and meeting and conferring about some disputed issues. The parties
5 recently discovered some difficulties and in some cases impossibilities of trying to schedule all
6 fact and expert discovery within the dates set by the Court, because various third party
7 deponents have scheduling conflicts. These scheduling difficulties can be resolved by extending
8 the fact and expert discovery deadlines by two weeks. The parties thus request that the Court (a)
9 extend the fact discovery deadline from June 8, 2012 to June 22, 2012 and (b) extend the expert
10 discovery deadline from August 10, 2012 to August 23, 2012.

11 **IT IS SO STIPULATED:**

12 Dated: April 25, 2012

Respectfully submitted,

14 MELINDA HAAG

15 United States Attorney

16 /s/ Michael T. Pyle
17 MICHAEL T. PYLE
18 Assistant United States Attorney

19 /s/ Steven F. Bruce
20 STEVEN F. BRUCE
21 Attorney for Plaintiffs

22 **PURSUANT TO STIPULATION, IT IS SO ORDERED:**

23 The fact discovery deadline is extended from June 8, 2012 to June 22, 2012 and the
24 expert discovery deadline is continued from August 10, 2012 to August 23, 2012.

25 DATED: 4/30/12
26 _____

