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12 UNITED STATES DISTRICT COURT
13
14 NORTHERN DISTRICT OF CALIFORNIA

15 ROBERT VALLADON,

16 Plaintiff,

17 v.

18 CITY OF OAKLAND,

19 Defendants.

Case No. C06-7478 SI

**STIPULATION AND (PROPOSED)
ORDER TO CONTINUE TRIAL DATE
AND ALL ATTENDANT DATES**

20 The parties to this action, by and through their attorneys of record hereby
21 stipulate to continue the trial date and all attendant dates to allow the parties to
22 complete remaining discovery.

23 Trial of this action is currently set in this Court for April 27, 2009. Non-expert
24 discovery cutoff is currently set for December 5, 2008. Due to the extensive number of
25 depositions (almost 200) and the difficulty scheduling all the witnesses, it is likely that
26 discovery cannot be timely completed despite good faith efforts by the parties.

27 THEREFORE, in order to allow the parties to fully and completely conduct the
28 remaining discovery, the parties hereby stipulate that the trial date in this action shall be
continued to a date acceptable to the Court. All attendant dates shall likewise be
continued.

The case management conference is continued to 1/23/09 @ 2:30 p.m.

The parties stipulate to the following proposed schedule:

1	Non-Expert Discovery closes	February 6, 2009
2	Disclose Experts	January 23, 2009
3	Disclose Rebuttal Experts	February 6, 2009
4	Expert Discovery Closes	March 20, 2009
5	Last Hearing Day for Dispositive Motions	May 8, 2009
6	Pretrial Conference	June 9, 2009 at 3:00 p.m. 3:30 p.m.
7	Trial	June 22, 2009

IT IS SO STIPULATED.

Dated: November 10, 2008

MEYERS, NAVE, RIBACK, SILVER & WILSON

By: _____

Geoffrey Spellberg
Geoffrey Spellberg
Attorney for Defendant
City of Oakland

Dated: November 10, 2008

AITCHISON & VICK, INC.

By: _____

Breanne Sheetz
Breanne Sheetz
Attorney for Plaintiff
Robert Valladon

ORDER

For good cause shown as set forth in the above stipulation, the Court hereby accepts the Stipulation and vacates the current April 27, 2009 trial date. The trial date and scheduled dates are as set forth above.

IT IS SO ORDERED:

Dated: _____

Susan Illston

Hon. Susan Illston
U.S. District Court Judge