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11 **UNITED STATES DISTRICT COURT**
 12 **NORTHERN DISTRICT OF CALIFORNIA**

13 MERCY AMBAT, ZAINABU ANDERSON, JOHN
 14 ARITA, DENNIS CARTER, SHARON CASTILLO,
 JOANNA CROTTY, TEQUISHA CURLEY, ALISA
 15 DAVIS-ZEHNER, MARLA DENZER, PATTI FLYNN,
 16 TERESA FOX, JON GRAY, TORI JACKSON, LISA
 JANSSEN, MICHAEL JONES, RICHARD LEE,
 17 SANDRA MACLIN-GIBSON, SUKHWANT MANN,
 GLORIA MARTIN, ARTURO MEDRANO, MARC
 18 NUTI, KEVIN O'SHEA, ANTHONY PEPPERS,
 19 VINCENT QUOCK, WENDY RODGERS-WELLS,
 LANA SLOCUM, ERNEST SMITH, TONYETTE
 20 SMITH-AL GHANI, MATTIE SPIRES-MORGAN,
 KENNETH TAN, ANJIE VERSHER, BONNIE
 21 WESTLIN, YVETTE WILLIAMS, ROLAND ZANIE,
 22 MICHAEL ZEHNER, PAMELA WALKER,
 GWENDOLYN HARVEY-NOTO, FELISHA
 23 THOMAS, JENNIFER KEETON, OLGA KINCADE,
 24 EMIKO THEODORIDIS, JEREMY DEJESUS, and
 MARTHA ORTEGA

Plaintiffs,

vs.

27 CITY AND COUNTY OF SAN FRANCISCO,

28 Defendant.

Case No. C-07-3622 SI
 (Consolidated with Case Number C-08-2406
 SI)

**JOINT STIPULATION AND
 [PROPOSED] ORDER TO MODIFY
 EXPERT REPORT DISCLOSURE AND
 FILING DEADLINES**

1 Plaintiffs and Defendant CITY AND COUNTY OF SAN FRANCISCO, by and through their
2 respective attorneys of record, hereby stipulate and request the Court to further modify the Pre-Trial
3 Scheduling Order by extending the date for filing Expert Witness Reports from October 9, 2009, to
4 October 30, 2009. It is requested that the court order the parties submit:

- 5 (a) Expert Witness Reports on or before October 30, 2009;
- 6 (b) Rebuttal Expert Witness Reports on or before November 15, 2009;
- 7 (c) Completion of Expert Depositions by December 11, 2009.

8 The motions for summary judgment are scheduled to be filed no later than January 8, 2010, the
9 opposition is due by January 22, 2010, the reply is due January 29, 2010, and hearing on the summary
10 judgment no later than February 12, 2010. Jury trial in this case is currently scheduled for March 29,
11 2010. None of these dates need be changed.

12 Good cause exists to change the Expert Witness Reports due date because discovery is still
13 ongoing, (a) the court having ordered production of documents not yet produced which may be
14 significant in the formulation of opinions of the various experts, (b) the court keeping discovery open for
15 the taking of depositions where the deponents have had to cancel and reschedule their depositions have
16 not had their depositions taken, and (c) there are numerous motions before the court for compelling
17 discovery and the court may not have ruled upon and the City produced the records by the time expert

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disclosure is due. For this reason, the parties respectfully request the Court modify the Pre-Trial Scheduling Order so that expert disclosure conformed to the foregoing new dates.

Dated: October 1, 2009

MURRAY & ASSOCIATES

By /s/ Lawrence D. Murray
Lawrence D. Murray
Attorney for Plaintiffs

Dated: October 1, 2009

DENNIS J. HERRERA
City Attorney
ELIZABETH SALVESON
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MARGARET W. BAUMGARTNER
Deputy City Attorney

By: /s/Margaret W. Baumgartner
MARGARET W. BAUMGARTNER
Attorneys for Defendant
CITY AND COUNTY OF SAN FRANCISCO

IT IS SO ORDERED.



Dated: _____

United States District Judge