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CITY AND COUNTY OF SAN FRANCISCO

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

MERCY AMBAT *et al.*

Plaintiffs,

vs.

CITY AND COUNTY OF SAN FRANCISCO,

Defendant.

No. **Case No. C-07-3622 SI**  
(including No: C-08-2406 SI & C-09-2652 SI)

**STIPULATION FOR ORDER AND ORDER  
PERMITTING EXTENSION ON DATES FOR  
COMMENCING DEPOSITIONS OF EXPERT  
WITNESSES**

Plaintiffs and Defendant CITY AND COUNTY OF SAN FRANCISCO, by and through their respective attorneys of record, hereby stipulate and request the Court to further modify the Pre-Trial Scheduling Order by extending:

- (a) All expert rebuttal reports, if any, shall be exchanged no later than December 18, 2010.
- (b) All depositions of rebuttal experts, if any, shall be completed by January 8, 2010.

1 (c) All depositions of Plaintiffs' Experts regarding damages shall be completed by February 26, 2010.

2 (d) The deposition of Ric Fatone Zayas shall be completed the week of January 11, 2010.

3 Furthermore, the motions for summary judgment are scheduled to be filed no later than January 8,  
4 2010, the opposition is due by January 22, 2010, the reply is due January 29,2010, and hearing on the  
5 summary judgment no later than February 12, 2010. Jury trial in this case is currently scheduled for March  
6 29, 2010. None of these dates need be changed.

7 Good cause exists to alter the completion dates for particular Expert Witnesses because the parties  
8 have been actively scheduling, calendaring, and completing depositions for expert witnesses' whose  
9 testimony is necessary for the filing of the parties' upcoming dispositive motions. Granting an extension for  
10 the completion of damage experts' depositions would save the unnecessary waste of the parties' time and  
11 resources.

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

14 Date: December 15, 2009

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16 MURRAY & ASSOCIATES

SAN FRANCISCO CITY ATTORNEY OFFICE

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19 /s/Lawrence D. Murray  
20 Lawrence D. Murray  
21 Attorney for Plaintiffs

/s/Margaret W. Baumgartner  
Margaret W. Baumgartner  
Attorney for Defendant  
City and County of San Francisco.

**ORDER ON STIPULATION FOR ORDER**

HAVING READ AND CONSIDERED THE FOREGOING, and good cause appearing:

The foregoing is the order of the court.

Date:



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SUSAN ILLSTON  
UNITED STATES DISTRICT COURT JUDGE

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