SANFORD M. CIPINKO, Esq., SBN 88102 1 JEREMY CLOYD, Esq., SBN 239991 2 LAW OFFICES OF SANFORD M. CIPINKO 55 FRANCISCO STREET, SUITE 403 3 SAN FRANCISCO, CA 94133 VOICE: (415) 693-9905 4 FACSIMILE: (415) 693-9904 5 Attorneys for Plaintiff MEHRDAD ALEMOZAFFAR 6 7 8 IN THE UNITED STATES DISTRICT COURT 9 FOR THE NORTHERN DISTRICT OF CALIFORNIA 10 11 Case No. C 07-04494 JSW MEHRDAD ALEMOZAFFAR, 12 Plaintiff, STIPULATION AND [PROPOSED] 13 ORDER REGARDING EXPERT VS. DISCOVERY 14 CITY AND COUNTY OF SAN 15 FRANCISCO, a municipal corporation; JESSE SERNA, individually and in his 16 official capacity as a police officer for the CITY AND COUNTY OF SAN 17 FRANCISCO: GARY MORIYAMA. individually and in his official capacity as a 18 police officer for the CITY AND COUNTY 19 OF SAN FRANCISCO; J. MCGRATH, individually and in his official capacity as a 20 police officer for the CITY AND COUNTY OF SAN FRANCISCO; J. REYMUNDO, 21 individually and in his official capacity as a) deputy sheriff officer for the CITY AND 22 COUNTY OF SAN FRANCISCO; G. 23 COVIELLO, individually and in his official capacity as a deputy sheriff officer for the 24 CITY AND COUNTY OF SAN FRANCISCO; and DOES 1-50, 25 individually and in their official capacities. 26 Defendants. 27

1	WHEREAS April 3, 2009 is the cut-off date for expert discovery;		
2	WHEREAS the parties have made substantial progress in completing expert		
3	depositions;		
4	WHEREAS the parties will be unable to complete four expert depositions by April		
5	3, 2009 due to the schedules for the experts and of counsel;		
6	THE PARTIES HEREBY AGREE AND STIPULATE, subject to approval by the		
7	Court, that the deadline to complete expert discovery shall be April 30, 2009.		
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9	Dated: March 25, 2009	LAW	OFFICES OF SANFORD M. CIPINKO
10		Б	
11		By:	/s/ JEREMY CLOYD, Attorneys for Plaintiff MEHRDAD ALEMOZAFFAR
12			
13	Dated: March 25, 2009		DENNIS J. HERRERA City Attorney
14			JOANNE HÖEPER Chief Trial Attorney
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16		Ву:	/s/ DANIEL ZAHEER
17			SCOTT D. WIENER Attorneys for Defendants
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[PROPOSED] ORDER

Good Cause Appearing,

Based on the foregoing stipulation and good cause appearing, the Court hereby ordered that the deadline to complete expert discovery shall be April 30, 2009.

Dated: March 30, 2009

