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9 MEHRDAD ALEMOZAFFAR

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

MEHRDAD ALEMOZAFFAR,
Plaintiff,

vs.

CITY AND COUNTY OF SAN FRANCISCO, a municipal corporation;
JESSE SERNA, individually and in his official capacity as a police officer for the CITY AND COUNTY OF SAN FRANCISCO; GARY MORIYAMA, individually and in his official capacity as a police officer for the CITY AND COUNTY OF SAN FRANCISCO; J. MCGRATH, individually and in his official capacity as a police officer for the CITY AND COUNTY OF SAN FRANCISCO; J. REYMUNDO, individually and in his official capacity as a deputy sheriff officer for the CITY AND COUNTY OF SAN FRANCISCO; G. COVIELLO, individually and in his official capacity as a deputy sheriff officer for the CITY AND COUNTY OF SAN FRANCISCO ; and DOES 1-50, individually and in their official capacities.
Defendants.

) Case No. C 07-04494 JSW

) **STIPULATION AND [PROPOSED]
ORDER REGARDING EXPERT
DISCOVERY**

1 WHEREAS the parties agreed on an expert discovery schedule, which the Court
2 approved on December 3, 2008;

3 WHEREAS expert disclosures are currently due by January 9, 2009 and
4 February 11, 2009 is the cut-off date for expert discovery;

5 WHEREAS plaintiff's attorney, Jeremy Cloyd, is on paid family leave from
6 December 15, 2008 through December 26, 2008 and plaintiff's trial attorney is out of the
7 country from December 22, 2008 through January 9, 2009;

8 WHEREAS defendants' attorney is out of the country the second half of
9 February;

10 WHEREAS the parties have met and conferred and are in agreement on a
11 second modified expert schedule taking into account the above circumstances and the
12 amount of time necessary to complete expert discovery;

13 AND WHEREAS this second modified expert schedule will not impact the
14 deadlines contained in the Court's pretrial preparation order;

15 THE PARTIES HEREBY AGREE AND STIPULATE, subject to approval by the
16 Court, that the deadline to disclose experts shall be January 30, 2009, and the deadline
17 to complete expert discovery shall be March 16, 2009.

18 Dated: December 15, 2008

LAW OFFICES OF SANFORD M. CIPINKO

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By: /s/

JEREMY CLOYD, Attorneys for Plaintiff
MEHRDAD ALEMOZAFFAR

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Dated: December 15, 2008

DENNIS J. HERRERA
City Attorney
JOANNE HOEPER
Chief Trial Attorney
RONALD P. FLYNN
Deputy City Attorney

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By: /s/

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 disclose experts shall be January 30, 2009, and the deadline to complete expert discovery shall be March 16, 2009.

Dated: December 15, 2008



THE HONORABLE JEFFREY S. WHITE
UNITED STATES DISTRICT JUDGE