McDermott v. Potter et al

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9
                             NORTHERN DISTRICT OF CALIFORNIA
10
                                   SAN FRANCISCO DIVISION
11
     JUDY A. McDERMOTT,
                                                   No. C 07-6300 SI
12
                                Plaintiff.
                                                   [RELATED CASE No. C 08-3432 SI]
13
                         v.
                                                   STIPULATION TO CONTINUE
14
     JOHN E. POTTER, POSTMASTER
                                                   CERTAIN DISCOVERY DEADLINES
     GENERAL,
                                                   AND TRIAL DATE;
15
                                                   [PROPOSED] ORDÉR
                                Defendant.
16
17
            Whereas on April 28, 2009, this Court scheduled the trial and discovery-related deadlines
18
     for the parties in this case; and
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20
            Whereas plaintiff takes the position that discovery is not progressing sufficiently quickly
     in order for her to meet the current deadlines set for the court and therefore has proposed a two
21
     month extension of time for the parties to meet the deadlines set by the Court; and
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23
            Whereas defendant agrees that an extension of time on the deadlines is appropriate and,
24
     in fact, the dates should be revisited at the currently-scheduled October 7, 2009, case management
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     conference;
           the parties therefore agree, stipulate and respectfully request that the Court issue an order
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27
     continuing the current deadlines and other case management dates as follows:
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1	<u>(</u>	Current Schedule	Proposed Schedule		
2	NON-EXPERT DISCOVERY CUTOFF:	10/28/09	12/24/09	12/18/09	
3	DESIGNATION OF EXPERTS:	10/1/09	12/1/09		
	REBUTTAL	11/18/09	1/19/10		
4	EXPERT DISCOVERY CUTOFF:	11/2/09	01/04/10		
5	DISPOSITIVE MOTIONS SHALL BE FILED	BY: 1/29/10	03/29/10		
6	OPPOSITON TO DISPOSITIVE MOTIONS	2/12/10	04/12/10		
	REPLY TO DISPOSITIVE MOTIONS	2/19/10	4/19/10		
7	DISPOSITIVE MOTIONS SET FOR HEARING	G 3/5/10	05/03/10	5/7/10	
8	PRETRIAL CONFERENCE DATE:	4/6/10 at 3:30 P.I		6/15/10	
9	JURY TRAIL DATED:	4/19/10 at 8:30 a.	m. 06/28/10	0, 15, 10	
10		Respectfully subn	nitted,		
11					
12	JUDY A. MCDERMOTT JOSEPH P. RUSSONIELLO United States Attorney				
13					
14	JUDY A. MCDERMOTT	$\frac{/s}{ARRAHAM A S}$	ABRAHAM A. SIMMONS		
15	Plaintiff	Assistant United S	Assistant United States Attorney Dated: September 18, 2009		
16	Dated: September 18, 2009	Dated: September	18, 2009		
	[PROPOSED] ORDER				
17	The stipulation is granted. The dates are adjusted a set forth in the stipulation. as amended				
18	Sugar Material as amended				
19	Cugan Illatan Diataiat Indaa				
20	Susan Illston, District Judge				
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28					
	Stipulation And [Proposed] Order C 07-6300 SI and 08-3432 SI	2			