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6 7 8	Attorneys for Defendants CITY OF OAKLAND, JENNIFER RAY, JOSEPH TORRES, JOHN FARRELL AND GERALD A. SIMON		
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10	UNITED STATES DISTRICT COURT		
11	NORTHERN DISTRICT OF CALIFORNIA		
12	NORTHERIVE	is the for each order.	
13	RONALD EL-MALIK CURTIS,) Case No. C10-00358-SI	
14	Plaintiff,) Date Action Filed: Jan. 6, 2010	
15	vs. CITY OF OAKLAND, JENNIFER RAY,) Current Trial Date: Sept. 6, 2011) Current Final Pretrial Con: Aug. 23, 2011	
16	JOSEPH TORRES, JOHN FARRELL AND GERALD A. SIMON, CHIEF, and)) STIPULATION AND JOINT REQUEST	
17	DOES 1 through 15,) FOR AN ORDER BY ALL PARTIES) EXTENDING THE DEADLINE FOR	
18	Defendants.	EXCHANGE OF FACT DISCOVERY	
19)	
20)	
21		_)	
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23	Defendants CITY OF OAKL.	AND, JENNIFER RAY, JOSEPH TORRES, JOHN	
24	FARRELL and GERALD A. SIMON ("Defendants") and Plaintiff RONALD EL-MALIK CURTIS		
25	("Plaintiff") (hereinafter referred to collectively as "the parties") hereby stipulate to extend the		
26	deadline for the exchange of fact discovery.		
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2. In the interests of justice, and for good cause, the parties	agree to extend fact
discovery in light of counsel for Defendants, Madelyn Jordan-Davis' un	expected medical leave. Ms
Davis is the lead counsel for Defendants and due to her earlier unplanne	ed absence there has been a
significant delay in the exchange of discovery. The parties hereby agree	e that if discovery closed on
April 1, 2011 then the trial will not be able to proceed on its full merits,	as much of the factual
investigation and discovery that is necessary for both parties has not bee	en completed. Accordingly,
in the interest of justice, the parties hereby stipulate and respectfully req	uest the Court enter an order
extending the deadline for the exchange of fact discovery from April 1,	2011 to September 30, 2011.

IT IS SO STIPULATED.

Pamela Y. Price Jacqueline Lindsey Attorneys for Plaintiff RONALD EL-MALIK CURTIS

Dated: June 6, 2011 FOSTER EMPLOYMENT LAW

> Michael W. Foster Madelyn G. Jordan-Davis Attorneys for Defendants CITY OF OAKLAND, OAKLAND FIRE DEPARTMENT, JENNIFER RAY, JOSEPH TORRES, JOHN FARRELL AND GERALD A. SIMON

FOSTERemploymentlaw 3000 Lakeshore Avenue Oakland, California 94610

[PKOPOSED] ORDER

Having read and considered the Stipulation and Joint Request for an Order Extending the Discovery Deadline and GOOD CAUSE APPEARING therefore, IT IS HEREBY ORDERED that the discovery deadline be reset to September 30, 2011. Counsel for Defendants shall promptly serve a copy of this Order on Plaintiff's counsel.

DATED: 6/20/11

