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4 5	Attorneys for Plaintiff HOLLYNN DELIL	
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9 10	Attorneys for Defendant GOLDEN GATE BRIDGE, HIGHWAY, AND TRANSPORTATION DISTRICT	
11		
L2	UNITED STAT	TES DISTRICT COURT
L 3	NORTHERN DIS	TRICT OF CALIFORNIA
L 4	HOLLYNN DELIL	CASE NO. C 08-1105 MEJ <u>Civ</u> il <u>Rights</u>
15	Plaintiff, v.	OWN RIGHTS
L 6 L 7 L 8	GOLDEN GATE BRIDGE, HIGHWAY, AND TRANSPORTATION DISTRICT; and DOES 1 through 20, Inclusive,	STIPULATION AND ORDER (PROPOSED) TO CONTINUE PRETRIAL DEADLINES AND TRIAL DATE
9	Defendants.	IRIAL DATE
20		
21	Plaintiff Hollynn Delil and Defenda	nt Golden Gate Bridge, Highway, And
2	Transportation District, by and through their	r counsel of record stipulate as follows:
3	1. This Stipulation And Order	(Proposed) To Continue Pretrial Deadlines And
24	Trial Dates is entered into between the part	ies with respect to the following presently
. 5	scheduled pretrial deadlines and trial date:	
:6	Stipulation And [Proposed] Order For Case Management Conference	1

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1		a.	September 10,2010:	Expert Witness Disclosure.
2		b.	September 20, 2010:	Rebuttal Expert Witness Disclosure.
3		c.	October 5, 2010:	Completion Of All Discovery
4		d.	November 4, 2010:	Last Day To File, Serve, And Notice
5				Dispositive Motions
6		e.	December 9, 2010:	Last Date to Hear Dispositive Motions.
7		f.	February 9, 2011:	Last Day to Meet and Confer for Pretrial
8				Statement Preparation and Content, Etc.
9		g.	February 24, 2011:	Last Day to File Joint Pretrial Statement And
10				Documents Described In FRCP 26(a)(3), Etc.
11				Last Day To File In Limine Motions
12		h.	March 3, 2011:	Last Day To File Opposition To In Limine
13		i.	March 10, 2011:	Pretrial Conference
14		j.	March 11, 2011:	Last Day To File Trial Briefs, Joint Set Of
15				Required Voir Dire, Voir Dire Questions Not
16				Agreed Upon, Joint Set Of Additional Proposed
17				Jury Instructions, And Joint Proposed Verdict
18			· .	Forms And Separate Verdict Forms
19		k.	April 7, 2011:	Final Pretrial Conference
20		1.	April 11, 2011	Trial
21	2.	The pa	arties have engaged in	settlement efforts over an extended period of time,
22	have attended	l multip	ole mediation sessions	and a settlement conference (see Docket Nos. 10,
23	16, 18, and 20) and, v	with the continuing ass	istance of mediator Howard Herman, presently are
24	engaged in di	scussio	ns and negotiations in	an effort to reach agreement on the remaining
25	unresolved iss	sues in t	the case with the object	ctive of reaching a global settlement of the case.
26	Stipulation And Case Managemen			2

- 1 The parties estimate that it will take between one to two months before they will be able to
- 2 complete the settlement process and know whether they will settle the case or proceed with the
- 3 pretrial and trial process.
- 4 3. The pending deadlines in the case present a significant impediment to the
- 5 parties reaching agreement on a global settlement: On the one hand, without an extension of
- 6 time to conduct and complete discovery, the parties will be forced to conduct expensive
- discovery concurrently with attempting to settle the case, which will significantly reduce the
- 8 prospects for a global settlement. On the other hand, given the present deadlines in the case, if
- 9 the parties do not engage in discovery concurrently with attempting to settle the case, they will
- 10 not have sufficient time to conduct the discovery that the case warrants.
- 11 4. Because it is in the best interest of the parties and the court process to complete
- the settlement phase of the case prior to incurring the substantial expense of discovery while at
- 13 the same time providing each side sufficient time to conduct necessary discovery or meet
- 14 subsequent deadlines if the parties are not able to reach a global settlement, which will
- maximize the prospects for a settlement, the parties submit that good cause exists to extend the
- 16 discovery deadlines and related follow on deadlines and dates.
- 17 NOW THEREFORE, it is hereby stipulated by and between plaintiff Hollynn Delil, by
- and through her attorney Sidney J. Cohen, Esq. and defendant Golden Gate bridge, Highway,
- 19 and Transit District, by and through its attorney Kurt Franklin, that the presently scheduled
- 20 pretrial and trial dates as set forth in paragraph 1a through i. be continued to the following
- 21 dates:
- a. November 3, 2010: Expert Witness Disclosure.
- b. November 15, 2010: Rebuttal Expert Witness Disclosure.
- 24 c. December 15, 2010: Completion Of All Discovery
- d. January 14, 2011: Last Day To File, Serve, And Notice
- 26 Stipulation And [Proposed] Order For Case Management Conference

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1				Dispositive Motions
2		е.	February 17, 2011:	Last Date to Hear Dispositive Motions.
3		f.	April 7, 2011:	Last Day to Meet and Confer for Pretrial
4				Statement Preparation and Content, Etc.
. 5		g.	April 21, 2011:	Last Day to File Joint Pretrial Statement And
6				Documents Described In FRCP 26(a)(3), Etc.,
7				And Last Day To File In Limine Motions
. 8		h.	April 28, 2011:	Last Day To File Opposition To In Limine
9		i.	May 5, 2011:	Pretrial Conference
10		j.	May 6, 2011:	Last Day To File Trial Briefs, Joint Set Of
11				Required Voir Dire, Voir Dire Questions Not
12			·	Agreed Upon, Joint Set Of Additional Proposed
13				Jury Instructions, And Joint Proposed Verdict
14				Forms And Separate Verdict Forms
15		k.	May 18, 2011:	Final Pretrial Conference
16	///			
17	///			•
18	///			
19				
20				
21				
22				•
23				
24				
25				
26	Stipulation And Case Managem			4

1		1.	May 23, 2011	Trial
2		It is fi	irther stipulated that th	his Stipulation may be signed in counterparts and
3	that facsimile	or elec	tronically transmitted	signatures of the Stipulation shall be as valid and
4	binding as orig	ginal si	gnatur e s.	
5	Date: 7/2	7/10	2	SIDNEY J. COHEN
6	• • •	• • •		PROFESSIONAL CORPORATION
7				By Jacon John
8		٠		Sidney J. Cohen Attorney for Plaintiff
9	Date: 1/27	/10		HANSON BRIDGETT LLP
10	,	•		1/1/2
11				Hart A Frankling Adam W. Holmes
12				Attorney for Defendant
13				onnen.
14				ORDER
15				EREFORE, it is ordered that the pretrial and trial
16	dates in this ac	ction ar	e continued to the fol-	lowing dates:
17		ā.	November 3, 2010:	Expert Witness Disclosure.
18	1	b.	November 15, 2010:	Rebuttal Expert Witness Disclosure.
19	(г.	December 15, 2010:	Completion Of All Discovery
20	(1.	January 14, 2011:	Last Day To File, Serve, And Notice
21				Dispositive Motions
22	, ¢	e .	February 17, 2011:	Last Date to Hear Dispositive Motions.
23	1	F,	April 7, 2011:	Last Day to Meet and Confer for Pretrial Statement
24			•	Preparation and Content, Etc.
25	į	j .	April 21, 2011:	Last Day to File Joint Pretrial Statement And
26	Stipulation And [F			5

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1			Documents Described In FRCP 26(a)(3), Etc.,
2			And Last Day To File in Limine Motions
3	h.	April 28, 2011:	Last Day To File Opposition To In Limine
4	i.	May 5, 2011:	Pretrial Conference
5	j.	May 6, 2011:	Last Day To File Trial Briefs, Joint Set Of
6			Required Voir Dire, Voir Dire Questions Not
7			Agreed Upon, Joint Set Of Additional Proposed
8			Jury Instructions, And Joint Proposed Verdict Forms
9		June 2	And Separate Verdict Forms
10	k.	May 18, 2011 : June 6	Final Pretrial Conference
11	1.	June 6 May 23, 2011	Trial
12			
13	IT IS SO O	RDERED.	
14	Date: August 9, 20	10	
15			Maria Elena James
			Umited States Magist / e Judge
16			United States Magistre Judge
			Umited States Magist Ce Judge
16			United States Magist Ce Judge
16 1 7			United States Magist Ce Judge
16 17 18			United States Magist Ce Judge
16 17 18 19			United States Magistrate Judge
16 17 18 19 20			United States Magistrate Judge
16 17 18 19 20 21			United States Magistrate Judge
16 17 18 19 20 21 22			United States Magistrate Judge
16 17 18 19 20 21 22 23			United States Magistrate Judge