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11  
 12 UNITED STATES DISTRICT COURT  
 13  
 14 NORTHERN DISTRICT OF CALIFORNIA

16 MICHAEL FOSTER.	) Case No.: CV-08-1944 EDL
	)
17 Plaintiff,	)
vs.	) <b>[PROPOSED] ORDER AND</b>
	) <b>STIPULATION RE: EXPERT WITNESS</b>
18 CITY OF OAKLAND, AUDREE JONES-	) <b>DISCLOSURE</b>
19 TAYLOR, and DOES 1-50, inclusive,	)
	)
20 Defendants	)

21  
 22 **TO ALL PARTIES AND THEIR ATTORNEY OF RECORD:**

23 The parties, acting by and through their respective legal counsel, hereby stipulate to the  
 24 following changes to paragraph 2(b) and 2(c) of the Case Management and Pretrial Order For Jury  
 25 Trial issued by the Honorable Elizabeth D. Laporte on July 25, 2008 (the Order).

26 Paragraph 2(b) of the Order dealing with discovery is revised as follows:

27 Initial expert witness disclosure shall be made no later than **April 10, 2009**. Rebuttal expert  
 28 disclosures shall be made no later than **May 1, 2009**. All treating physicians who will provide

1 opinion testimony beyond that which can be provided by a lay person must be disclosed as expert  
2 witnesses, but they need not prepare expert reports unless ordered to do so by the Court.

3 Paragraph 2(c) of the Order dealing with discovery is revised as follows:

4 All expert discovery shall be completed no later than **May 22, 2009**. There will be no further  
5 expert discovery after that date except by order of the Court for good cause shown. Motions to  
6 compel expert discovery must be filed within the time limits contained in Civil Local Rule 26-2.

7 So Stipulated.

8 Dated: March 20, 2009

Law Offices of Charles A. Bonner

9  
10 By: \_\_\_\_\_ /s/

11 Cabral Bonner  
12 Catherine Lagarde  
13 Attorneys for Plaintiff MICHAEL FOSTER

14 Dated: March 20, 2009

BERTRAND, FOX, & ELLIOT

15  
16 By: \_\_\_\_\_ /s/

17 Eugene B. Elliot  
18 Christine Lee  
19 Attorneys for Defendant  
20 CITY OF OAKLAND

21 Good cause appearing, the stipulation is so ordered.

22 Dated: March 23, 2009

23 The Honorable  
24 U.S. District



