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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

VALERIE GEORGE, as Administrator and
Personal Representative of THE ESTATE OF
RYAN GEORGE; VALERIE GEORGE and/or
TAJMAH BEAUCHAMP, as Legal
Representative(s) for Jaida George and Ryan
George, Jr.; VALERIE GEORGE, Individually;
DONALD GEORGE; and TAJMAH
BEAUCHAMP, Individually,

Plaintiffs,

vs.

SONOMA COUNTY SHERIFF'S
DEPARTMENT; BILL COGBILL; COUNTY
OF SONOMA; CALIFORNIA FORENSIC
MEDICAL GROUP, INC; JAMES LUDERS,
M.D.; MICHAEL E. DAGEY, R.N.; SUTTER
HEALTH; SUTTER MEDICAL CENTER OF
SANTA ROSA; EDWARD W. HARD, M.D.;
RICHARD FLINDERS, M.D.; JOSEPH N.
MATEL, M.D.; NORICK JANIAN, M.D.;
ANGUS MATHESON, M.D., and DOES 1
through 25, inclusive,

Defendants.

Case No. 3:08-cv-02675-EDL

ECF Case

**STIPULATION AND [PROPOSED]
ORDER RE PRETRIAL CASE
MANAGEMENT DEADLINES**

JURY TRIAL DEMANDED

IT IS HEREBY STIPULATED AND AGREED by and among the parties hereto, through their attorneys of record, that:

- (i) In order to avoid the expense and time of potentially unnecessary expert discovery and dispositive motion practice, and
- (ii) To facilitate the mediation scheduled for March 23, 2010,

subject to the Court's approval, the Order Following Further Case Management Conference dated November 18 2009 (Doc #226), is hereby amended as follows:

1. ALTERNATIVE DISPUTE RESOLUTION -- MEDIATION

All parties have agreed to privately mediate this case and attend a full-day mediation scheduled before the Honorable Rebecca Westerfield (of JAMS) on March 23, 2010.

2. EXPERTS

- a. Plaintiffs shall disclose the names of their rebuttal experts by February 19, 2010;
- b. Rebuttal reports shall be produced by February 22, 2010; and
- c. All expert discovery, including depositions of experts, shall be completed no later than May 7, 2010.

3. MOTIONS

- a. The last day for hearing dispositive motions shall be June 15, 2010, 9:00a.m, without prejudice to motions being heard on an earlier date.
- b. The parties agree to file their dispositive motions at least ⁵⁷~~50~~ days before the noticed hearing date.

c. Responsive papers to dispositive motions shall be filed ³²~~25~~ days before the noticed hearing date.

d. Reply papers in support of dispositive motions shall be filed ²¹~~14~~ days before the noticed hearing date.

4. TRIAL

The trial date of September 7, 2010 which the Court set by Order dated December 3, 2009 (Doc #233) shall remain in effect.

DATED: February 3, 2010

SANFORD, WITTELS & HEISLER, LLP
Attorneys for Plaintiffs
VALERIE GEORGE, TAJMAH BEAUCHAMP,
and DONALD GEORGE

By: /s/
Steven L. Wittels, Esq.

DATED: February 3, 2010

SPAULDING McCULLOUGH & TANSIL, LLP
Attorneys for Defendants
SONOMA COUNTY SHERIFF'S DEPARTMENT,
BILL COGBILL and COUNTY OF SONOMA

By: /s/
Terry S. Sterling, Esq.

DATED: February 3, 2010

TRIMBLE, SHERINIAN & VARANINI
Attorneys for Defendants
CALIFORNIA FORENSIC MEDICAL GROUP,
INC.; JAMES LUDERS, M.D. and MICHAEL E.
DAGEY, R.N.

By: /s/
Jerome M. Varanini, Esq.

DATED: February 3, 2010

LAFOLLETTE, JOHNSON, DEHAAS, FESLER
& AMES
Attorneys for Defendant
SUTTER MEDICAL CENTER OF SANTA ROSA

By: /s/
Larry Byron Thornton, Esq.

DATED: February 3, 2010

HASSARD BONNINGTON LLP
Attorneys for Defendants
JOSEPH N. MATEL, M.D. and RICHARD
FLINDERS, M.D.

By: /s/
Joanna L. Storey, Esq.

DATED: February 3, 2010

ROGASKI, PEOVOLOS, WEBER &
PATTERSON, LLP
Attorneys for Defendant
NORICK JANIAN, M.D.

By: /s/
Chester A. Rogaski, Jr., Esq.

Dated: February 8, 2010

SO ORDERED: _____ *Elijah D. Legante*
U.S.D.M.J.