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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 the Stipulation and Order re Pretrial Case

Management Deadlines dated February 9, 2010 (Doc #266), is further amended as

follows:

1. TRIAL DATE

All parties have agreed to a trial commencing on January 24, 2011, an

available date proposed by the Court. Accordingly, all intermediate case

management deadlines will be extended by approximately 3 months.

2. EXPERTS

a. All expert discovery, including depositions of experts, shall be completed

no later than July 30, 2010.

3. MOTIONS

a. The last day for hearing dispositive motions shall be September 21, 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 days before

the noticed hearing date.

c. Responsive papers to dispositive motions shall be filed 32 days before the

noticed hearing date.

d. Reply papers in support of dispositive motions shall be filed 21 days

before the noticed hearing date.

DATED: April 7, 2010

SANFORD, WITTELS & HEISLER, LLP

Attorneys for Plaintiffs

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

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DATED: April 7, 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: April 7, 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: April 7, 2010	LAFOLLETTE, JOHNSON, DEHAAS, FESLER & AMES Attorneys for Defendant SUTTER MEDICAL CENTER OF SANTA ROSA
	By: /s/ Larry Byron Thornton, Esq.
	Larry Byron Thornton, Esq.
DATED: April 7, 2010	ROGASKI, PREOVOLOS, WEBER & PATTERSON, LLP Attorneys for Defendant NORICK JANIAN, M.D.
	By: /s/ Chester A. Rogaski, Jr., Esq.
	Chester A. Rogaskı, Jr., Esq.
SO ORDERED: Elijah?	D. Lant. U.S.D.M.J.

Dated: April 8, 2010