

LAFAYETTE & KUMAGAI LLP
ATTORNEYS AT LAW
100 SPEAR STREET, SUITE 600
SAN FRANCISCO, CALIFORNIA 94105
(415) 357-4600
FAX (415) 357-4605

1 LAFAYETTE & KUMAGAI LLP
2 GARY T. LAFAYETTE (State Bar No. 088666)
3 glafayette@lkclaw.com
4 MICHAEL J. ENG (State Bar No. 230788)
5 meng@lkclaw.com
6 100 Spear Street, Suite 600
7 San Francisco, California 94105
8 Telephone: (415) 357-4600
9 Facsimile: (415) 357-4605
10 *Attorneys for Defendant*
11 DEBORAH EDGERLY

12 RUIZ & SPEROW, LLP
13 CELIA M. RUIZ (State Bar No. 87671)
14 cmruiz@ruizlaw.com
15 JONATHAN D. MARTIN (State Bar No. 188744)
16 jmartin@ruizlaw.com
17 Watergate Tower III
18 2000 Powell Street, Suite 1655
19 Emeryville, CA 94608
20 Telephone: (510) 594-7980
21 Facsimile: (510) 594-7988
22 *Attorneys for Defendant*
23 CITY OF OAKLAND

24 LAW OFFICES OF JOHN L. BURRIS
25 JOHN L. BURRIS (State Bar No. 69888)
26 John.Burris@JohnBurrisLaw.com
27 7677 Oakport Street, Suite 1120
28 Oakland, California 94621-1939
Telephone: (510) 839-5200
Facsimile: (510) 839-3882
Attorneys for Plaintiff
LARAE BROWN

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

LARAE BROWN,

Plaintiff,

v.

CITY OF OAKLAND, a municipal
corporation; DEBORAH EDGERLY, in her
official capacity as the City Administrator
for the CITY OF OAKLAND; DOES 1
through 25, inclusive,

Defendants.

Case No. C 08-03972 VRW

Complaint Filed: 8/20/2008

Amended Complaint Filed: 3/12/2009

**JOINT STIPULATION TO MODIFY
PRETRIAL SCHEDULING AND
~~PROPOSED~~ ORDER MODIFYING
PRETRIAL SCHEDULING**

1 Due to Plaintiff LARAE BROWN's counsel's trial schedule, Defendant DEBORAH
2 EDGERLY's counsel's trial schedule, and Defendant CITY OF OAKLAND's counsel's
3 unavailability, the parties in the above-entitled action have not been able to complete discovery,
4 including the taking of depositions. The parties, through their counsel of record, hereby stipulate
5 to and request an order modifying the pretrial scheduling in the September 17, 2009, Civil
6 Pretrial Minutes. The parties request the following scheduling:

- | | | | |
|----|-----|--|-------------------|
| 7 | (a) | Non-expert discovery cut-off | October 29, 2010 |
| 8 | (b) | Last day to disclose expert witnesses | November 16, 2010 |
| 9 | (c) | Last day to disclose rebuttal expert witnesses | November 30, 2010 |
| 10 | (d) | Expert discovery cut-off | December 30, 2010 |
| 11 | (e) | Last day to hear dispositive motions | April 14, 2011 |
| 12 | (f) | Pretrial conference | May 26, 2011 |

13
14 Respectfully submitted,

15 Dated: June 23, 2010

LAFAYETTE & KUMAGAI LLP

/s/ Michael J. Eng

17 MICHAEL J. ENG
18 Attorneys for Defendant
DEBORAH EDGERLY

19 Dated: June 29, 2010

RUIZ & SPEROW, LLP

/s/ Jonathan D. Martin

21 JONATHAN D. MARTIN
22 Attorneys for Defendant
23 CITY OF OAKLAND

24 Dated: June 23, 2010

LAW OFFICES OF JOHN L. BURRIS

/s/ John L. Burris

26 JOHN L. BURRIS
27 Attorney for Plaintiff
28 LARAE BROWN

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

ORDER

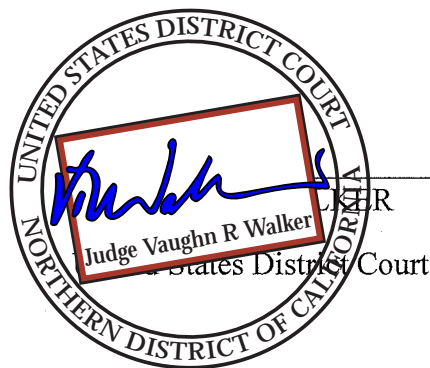
PURSUANT TO STIPULATION IT IS SO ORDERED:

The pretrial scheduling in the September 17, 2009, Civil Pretrial Minutes is modified as follows:

- (a) Non-expert discovery cut-off October 29, 2010
- (b) Last day to disclose expert witnesses November 16, 2010
- (c) Last day to disclose rebuttal expert witnesses November 30, 2010
- (d) Expert discovery cut-off December 30, 2010
- (e) Last day to hear dispositive motions April 14, 2011 at 10:00AM
- (f) Pretrial conference May 26, 2011 at 3:30PM.

IT IS SO ORDERED.

Date: July 12, 2010



LAFAYETTE & KUMAGAI LLP
 ATTORNEYS AT LAW
 100 SPEAR STREET, SUITE 600
 SAN FRANCISCO, CALIFORNIA 94105
 (415) 357-4600
 FAX (415) 357-4605