## **EXHIBIT A**

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## UNITED STATES DISTRICT COURT 1 NORTHERN DISTRICT OF CALIFORNIA 2 3 MITCHELL ENGINEERING, a California Case No. CV 08 4022 SI corporation, 4 STIPULATION AND [PROPOSED] ORDER MODIFYING PRETRIAL DEADLINES Plaintiff, 5 6 VS. CITY AND COUNTY OF SAN FRANCISCO, 7 a political subdivision of the State of California; ANTHONY IRONS, in his individual capacity 8 and, alternatively, in his official capacity as Assistant General Manager of the San Francisco 9 Public Utilities Commission; MICHAEL QUAN, in his individual capacity 10 and, alternatively, in his official capacity as Director of Construction Management Bureau 11 of the San Francisco Public Utilities Commission; ALAN WONG, in his individual 12 capacity and, alternatively, in his official capacity as Safety Manager of the San 13 Francisco Public Utilities Commission; and DOES 1 through 10, inclusive, 14 Defendants. 15 16 It is stipulated by and between counsel for Plaintiff MITCHELL ENGINEERING and 17 counsel for Defendants CITY AND COUNTY OF SAN FRANCISCO, ANTHONY IRONS. 18 MICHAEL QUAN AND ALAN WONG that the Court's Pretrial Preparation Order be amended 19 as follows: 20 Non-Expert Discovery Cut-off: March 29, 2010; 1. 21 Designation of Experts: April 8, 2010; rebuttal: April 30, 2010; 2. 22 Expert Discovery Cut-off: May 28, 2010; 3. 23 Dispositive motions shall be filed by May 14, 2010; Oppositions due May 28, 4. 24 2010; Replies due June 4, 2010; and set for hearing no later than June 18, 2010 at 9:00 a.m.; 25 Pretrial conference date: July 20, 2010 at 3:30 p.m.; and 5. 26

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Jury trial date: August 2, 2010 at 8:30 a.m. in Courtroom 10, 19th Floor.

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It is further stipulated and agreed that each party seeks to maintain all other pretrial 1 preparatory dates including the trial date, and that no party shall use the extensions of fact and 2 expert discovery as grounds for a trial continuance. 3 IT IS SO STIPULATED. 4 ALLEN MATKINS LECK GAMBLE & 5 Dated: February \_\_\_\_, 2010 MALLORY & NATSIS LLP ROBERT R. MOORE, ESQ, (SBN 113818) MICHAEL J. BETZ, ESQ. (SBN 196228) 6 7 8 By: 9 Attorneys for Plaintiffs MITCHELL ENGINEERING 10 11 Dated: February 5, 2010 HANSON BRIDGETT LLP 12 13 S. ANNE JOHNSON 14 Attorneys for Defendants CITY AND COUNTY OF SAN 15 FRANCISCO, a political subdivision of the State of California; ANTHONY IRONS, in 16 his individual capacity and, alternatively, in his official capacity as Assistant General 17 Manager of the San Francisco Public Utilities Commission; MICHAEL QUAN, 18 in his individual capacity and, alternatively, in his official capacity as Director of 19 Construction Management Bureau of the San Francisco Public Utilities Commission; 20 ALAN WONG, in his individual capacity and, alternatively, in his official capacity as 21 Safety Manager of the San Francisco Public **Utilities Commission** 22 23 IT IS SO ORDERED 24 3/8/10 Dated: 25 HON, SUSAN ILLSTON UNITED STATES DISTRICT COURT 26 JUDGE 27 28 STIPULATION AND PROPOSED ORDER MODIFYING PRETRIAL 2222253.2 DEADLINES; CASE NO. CV 08 4022 SI