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 9 COUNTY OF ALAMEDA, MARCY TAKEUCHI,
 10 DALE BILLITER and MICHAEL YEE

11 UNITED STATES DISTRICT COURT
 12 NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO

13 DANIELLE POLLAR, SHALAWN)
 14 POLLAR, Guardian Ad Litem for J.A., a)
 15 minor,)
 16 Plaintiffs,)
 17 vs.)
 18 COUNTY OF ALAMEDA, MARY)
 19 TAKEUCHI, DALIE BILLITER, MICHAEL)
 20 YEE, CITY OF HAYWARD, SAM)
 21 SANDER, MIKE EDWARDS and DOES 1)
 22 through 20, inclusive,)
 23 Defendants.)

Case No.: C08-04196 BZ (JL)
**STIPULATION AND [PROPOSED]
 ORDER TO CONTINUE FACT
 DISCOVERY CUT-OFF DATE**

24 The parties hereto, by and through their undersigned counsel, request that the discovery
 25 cut-off in this action be continued for a period of 21 days. The parties have diligently pursued
 26 and cooperated in the discovery process. However, due to a combination of witness and counsel
 27 unavailability, the parties are unable to complete all fact witness depositions prior to the fact
 28 discovery cut-off of November 6, 2009. The parties, therefore, request an additional 21 days
 within which to complete these depositions and all other fact discovery. No other court-ordered
 deadlines will be affected if the requested extension is granted.

The parties respectfully request that the Court extend the fact discovery cut off in this
 matter to November 27, 2009.

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IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

Dated: October 20, 2009 LAW OFFICES OF ROBERT R. POWELL

By: */s/ Robert R. Powell
Robert R. Powell
Attorneys For Plaintiffs
*Mr. Powell provided his verbal consent
that this document be electronically filed.

Dated: October 19, 2009 HAAPALA, THOMPSON & ABERN, LLP

By: /s/ Rebecca S. Widen
Rebecca S. Widen
Attorneys For Defendants
COUNTY OF ALAMEDA,
MARCY TAKEUCHI, MICHAEL YEE, and
DALE BILLITER


Dated: October 20, 2009 CLAPP, MORONEY, BELLAGAMBA, VUCINICH,
BEEMAN AND SCHELEY

By: */s/ Patrick Co
Patrick Co
Attorneys For Defendants
CITY OF HAYWARD, SAM SANDER and
MIKE EDWARDS
*Mr. Co provided his consent that this
document be electronically filed.

ORDER

Pursuant to stipulation and for good cause shown, it is SO ORDERED.

Dated: October 20, 2009



Honorable Bernard Zimmerman
United States Magistrate Judge