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18
 19 UNITED STATES DISTRICT COURT
 20 NORTHERN DISTRICT OF CALIFORNIA
 21 SAN FRANCISCO DIVISION

22 MALINDA DOTSON,
 23 Plaintiff,
 24 v.
 25 UNITED STATES OF AMERICA, et al.
 26 Defendant.
 27 _____)

No. C 08-04291 SI
**STIPULATION AND [PROPOSED]
 ORDER TO MODIFY THE PRETRIAL
 AND TRIAL SCHEDULE**

1 The parties, plaintiff Malinda Dotson, federal defendant United States of America and
2 individual defendants, Megan Hamreus, M.D., Frank Zazueta, M.D., Christopher Wallace, M.D.
3 and Alexander Strachan, respectfully request modification of the existing Scheduling Order as
4 follows:

5 WHEREAS, pursuant to the Order entered by this Court, pursuant to Stipulation of the
6 Parties ("Scheduling Order"), expert discovery closes on January 28, 2011;

7 WHEREAS, the parties have begun expert depositions, but due to scheduling conflicts
8 the parties will not be able to complete expert depositions before January 28, 2011;

9 WHEREAS, the parties have agreed to and respectfully request a modification in the
10 pretrial and trial schedule in this action as follows:

11 The plaintiff shall have until February 11, 2011 to complete the depositions of Raju
12 Gandhi, M.D. and Samuel LeBaron, M.D. and the Federal Defendant and Individual Defendants
13 shall have until March 18, 2011 to complete the deposition of Laurence Badgley, M.D..

14 IT IS SO STIPULATED

15 DATED: January 26, 2011

Respectfully submitted,

16 MELINDA HAAG
United States Attorney
17 /s/ Melissa Brown

18 _____
MELISSA K. BROWN
19 MICHAEL T. PYLE
Assistant United States Attorney

20 DATED: January 26, 2011

LAW OFFICES OF JAMES A ZITO,
21 /s/ James Zito

22 _____
JAMES A. ZITO
Attorneys for Plaintiff, Malinda Dotson

23 DATED: January 26, 2011

MITCHELL, BRISSO, DELANEY & VRIEZE,
24 /s/ Nancy Delaney

25 _____
NANCY K. DELANEY
26 Attorneys for Individual Defendants,
27 Zazueta, Wallace, Hamreus and Strachan
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[PROPOSED] ORDER

Pursuant to stipulation of the parties, the plaintiff shall have until February 11, 2011 to complete the depositions of Raju Gandhi, M.D. and Samuel LeBaron, M.D. and the Federal Defendant and Individual Defendants shall have until March 18, 2011 to complete the deposition of Laurence Badgley, M.D.

SO ORDERED



DATED: _____

HONORABLE SUSAN ILLSTON
United States District Court Judge