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7 Attorneys for Defendant

8 UNITED STATES DISTRICT COURT  
 9 NORTHERN DISTRICT OF CALIFORNIA  
 10 SAN FRANCISCO DIVISION

11 GURMINDER SINGH, ) No. 08-04337 EDL  
 )  
 12 Plaintiff, )  
 )  
 13 v. )  
 )  
 14 JOHN E. POTTER, POSTMASTER )  
 GENERAL, U.S. POSTAL SERVICE, )  
 15 )  
 Defendant. )

**STIPULATION AND [PROPOSED]  
 ORDER TO EXTEND CASE  
 DEADLINES AS AMENDED**

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1           The parties jointly request that the present deadlines be extended in this matter by 90  
2 days. The parties offer this joint stipulation in support of their request. If the Court prefers to  
3 discuss scheduling matters at a case management conference, the parties request the Court set a  
4 course management conference in November 2009.

5           WHEREAS, Plaintiff did not retain counsel to represent him until after he filed the  
6 original complaint in this matter;

7           WHEREAS, Plaintiff did not file his Amended Complaint until September 1, 2009 and  
8 Defendant did not answer the Complaint until September 14, 2009, less than a year prior to the  
9 current trial date of September 7, 2010;

10          WHEREAS, Plaintiff's counsel has been busy tending to the health of her mother;

11          WHEREAS, this matter has been reassigned to new Assistant United States Attorney,  
12 Thomas R. Green, who is scheduled to attend a mandatory training program in South Carolina  
13 for the last two weeks of October; and

14          WHEREAS, the parties have begun to discuss settlement, are working diligently to  
15 prepare this case for trial in the absence of a settlement, but require more time to conduct the  
16 mediation and prepare for trial.

17          The parties stipulate to the following new case deadlines:

- |    |                               |                   |
|----|-------------------------------|-------------------|
| 18 | 1. Mediation                  | January 26, 2010  |
| 19 | 2. Fact Discovery             | April 30, 2010    |
| 20 | 3. Initial Expert Disclosure  | May 7, 2010       |
| 21 | 4. Rebuttal Expert Disclosure | May 21, 2010      |
| 22 | 5. Expert Discovery           | June 4, 2010      |
| 23 | 6. Dispositive Motion Filing  | July 13, 2010     |
| 24 | 7. Dispositive Motion Hearing | August 17, 2010   |
| 25 | 8. Pretrial Conference        | November 16, 2010 |
| 26 | 9. Trial                      | December 7, 2010  |

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It is so stipulated, through counsel of record.

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DATED: September 30, 2009

Respectfully submitted,  
JOSEPH P. RUSSONIELLO  
United States Attorney

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/s/

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THOMAS R. GREEN  
Assistant United States Attorney

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DATED: September 30, 2009

*Denise Eaton May*  
DENISE EATON MAY  
Attorney for Plaintiff

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**ORDER**

The case management schedule is revised to reflect the following new case deadlines:

- 10. Mediation January 26, 2010
- 11. Fact Discovery April 30, 2010
- 12. Initial Expert Disclosure May 7, 2010
- 13. Rebuttal Expert Disclosure May 21, 2010
- 14. Expert Discovery June 4, 2010
- 15. Dispositive Motion Filing July 13, 2010
- 16. Dispositive Motion Hearing August 17, 2010
- 17. Pretrial Conference November 16, 2010
- 18. Trial ~~December 7, 2010~~ December 6, 2010 at 8:30AM

**IT IS SO ORDERED.**

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Dated: October 5, 2009

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ELIZABETH  
United States

