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 CITY OF OAKLAND

6 Doc. 703725  
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8 UNITED STATES DISTRICT COURT  
 9 NORTHERN DISTRICT OF CALIFORNIA

11		)	MASTER CASE NO: C00-4599 TEH
12	DELPHINE ALLEN, et al.,	)	OLIVER CASE NO.: C08-04914 TEH
13	Plaintiffs,	)	<b>STIPULATION AND PROPOSED ORDER</b>
14	CITY OF OAKLAND, et al.,	)	<b>FOR PRETRIAL PREPARATION</b>
15	Defendants.	)	
16	<hr/> REGINALD OLIVER, et al.,	)	
17	Plaintiffs,	)	
18	vs.	)	
19	<hr/> CITY OF OAKLAND, et al.,	)	
20	<hr/> AND RELATED CASES	)	
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23		)	
24		)	
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1 Pursuant to the Court's Order at the September 16, 2010 case management  
2 conference, plaintiffs Reginald Oliver, et al. through their attorney John L. Burris and  
3 James B. Chanin and Defendants City of Oakland et al. through their attorneys John A.  
4 Russo, Randolph W. Hall and William E. Simmons stipulate as follows:

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6 1. **Trial Date**: Trial in this matter is scheduled to begin April 19, 2011 at 9:00 a.m.  
7 before the Honorable Thelton E. Henderson. Trial shall last for an estimated 5 trial  
8 days. The trial of liability and damages issues is not applicable. Injunctive relief is the  
9 only issue at trial.

10 2. **Pretrial Conference**: Pretrial conference will be held on Monday, March 28, 2011,  
11 at 3:00 p.m.

12 3. **Discovery**:

13 (a) **Discovery Cutoff**: All discovery, except for depositions of expert witnesses,  
14 shall be completed on or before February 17, 2011.

15 (b) **Disclosures Regarding Expert Witness**: Plaintiffs shall comply with Federal  
16 Rule of Civil Procedure 26(a)(2)(A) (i.e. disclose the identity of any person who  
17 may be used at trial to prevent expert testimony) no later than March 1, 2011.  
18 Defendants shall disclose the identity of their expert witnesses no later than  
19 March 15, 2011.

20 4. **Pretrial Motions (except Motions In Limine)**:

21 All such motions must be noticed for hearing no later than Monday, February 28,  
22 2011. All such motions must be filed at least 35 days in advance of the hearing  
23 date, or no later than Monday, January 24, 2011. Civ. L.R. 7-2(a).

24 5. **Pretrial Conference Statement**:

25 (a) **Required Meeting and Disclosure Prior to Pretrial Conference**. Lead  
26 counsel who will try the case shall meet and confer on or before February 28,

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2011 (at least 30 calendar days before the pretrial conference).

**6. Settlement Conference:**

The parties shall arrange for a mandatory settlement conference before Magistrate Judge Maria Elena James of this Court. This conference shall be scheduled to take place no later than 5 calendar days before the pretrial conference.

**7. Further Case Management Conference:**

A further case management conference will be held on Monday, November 29, 2010, at 1:30 p.m.

**8. The parties further stipulate that in addition to the specific dates set forth herein, they will comply with all requirements set forth in this Court's standard **Proposed Order for Pretrial Preparation.****

*Randolph W. Hall*  
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RANDOLPH W. HALL  
Attorney for Defendants  
CITY OF OAKLAND

Date: 9-30-10

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\_\_\_\_\_  
JAMES B. CHANIN  
Attorney for Plaintiffs  
REGINALD OLIVER, et al.

Date: \_\_\_\_\_

/ S /

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JOHN L. BURRIS  
Attorney for Plaintiffs  
REGINALD OLIVER, et al.

Date: \_\_\_\_\_

