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 6 Derek E. Turner and Mari Toban Blome

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 9 UNITED STATES DISTRICT COURT
 10 NORTHERN DISTRICT OF CALIFORNIA

12 DEREK E. TURNER and MARI TOBAN
 BLOME,

13 Plaintiffs,

14 v.

15 KRIS LAFOND; MEG PLANKA; DANIEL
 16 SCHNEIDER; CALIFORNIA HIGHWAY
 PATROL COMMISSIONER J.A. FARROW;
 17 THE GOLDEN GATE BRIDGE, HIGHWAY
 AND TRANSPORTATION DISTRICT and
 18 Does 1 through 20,

19 Defendants.

Case No. 3:09-cv-00683-MHP

**STIPULATION EXTENDING CLOSE
 OF DISCOVERY AND CONTINUING
 SUMMARY JUDGMENT BRIEFING
 SCHEDULE PURSUANT TO CIV. L. R.
 6-1**

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 STIPULATION EXTENDING CLOSE OF DISCOVERY AND CONTINUING SUMMARY JUDGMENT
 BRIEFING SCHEDULE PURSUANT TO CIV. L. R. 6-1

1 Pursuant to Civil Local Rules 6-1(b) and 7-12, Plaintiffs Derek E. Turner and Mari Toban
2 Blome (“Plaintiffs”) and Defendants Kris Lafond, Margaret Planka, Daniel Schneider, the
3 California Highway Patrol Commissioner J.A. Farrow, and The Golden Gate Bridge Highway
4 and Transportation District (collectively the “Parties”), hereby stipulate to the following:

5 **WHEREAS**, Plaintiff Derek E. Turner filed his initial complaint in this proceeding on
6 February 17, 2009;

7 **WHEREAS**, Plaintiffs Derek E. Turner and Mari Toban Blome filed their First
8 Amended Complaint on October 13, 2009;

9 **WHEREAS**, there has been only one prior time modification in this case whereby,
10 pursuant to a stipulation, the Court continued the hearing on Plaintiff Derek E. Turner’s Motion
11 for Leave to File First Amended Complaint for one week from 2:00 p.m. on September 21, 2009
12 to 3:00 p.m. on September 28, 2009 so that it could be heard concurrently with an already
13 scheduled case management conference;

14 **WHEREAS**, at a case management conference on January 11, 2010, the Court ordered
15 that:

- 16 1) CIC Witness list by May 17, 2010;
- 17 2) Expert Designation/Final Reports by May 17, 2010;
- 18 3) Completion of all discovery by June 14, 2010;
- 19 4) Summary Judgment motions to be filed by July 26, 2010;
- 20 5) Oppositions to be filed by August 16, 2010;
- 21 6) Replies to be filed by August 23, 2010;
- 22 7) Motions to be heard 2:00 p.m. on September 13, 2010;

23 **WHEREAS**, the Parties have been diligently conducting discovery in this case pursuant
24 to the Court’s schedule and the Defendants have designated four expert witness;

25 **WHEREAS**, the Parties agree that, in the interests of fairness and efficiency, and in light
26 of the large volume of electronic discovery in this case and the need for multiple expert
27 depositions, the deadline for the close of all discovery in this case should be extended until July
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1 12, 2010.

2 **WHEREAS**, the Parties also agree that, the purpose of the extended deadline for close of
3 discovery is to permit the completion of existing discovery, and not for the purpose of
4 propounding new discovery that could not have been propounded under the current discovery
5 cut-off. As such, for purposes of determining whether discovery was timely propounded, absent
6 mutual consent, the original deadline of June 14, 2010 will apply.

7 **WHEREAS**, the Parties agree that, to accommodate the extension in the discovery
8 schedule, the deadlines for summary judgment motions should be extended by four weeks.

9 **NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED**, by and
10 between the Parties, through their respective attorneys, that pursuant to Northern District Civil
11 Local Rule 6-1(a) that:

12 1) The deadline for completion of all discovery be extended to July 12, 2010;

13 2) For purposes of determining whether discovery was timely propounded, absent
14 mutual consent, the original discovery deadline of June 14, 2010 shall apply;

15 2) Summary Judgment motions to be filed by August 23, 2010;

16 3) Oppositions to be filed by September 13, 2010;

17 4) Replies to be filed by September 20, 2010;

18 5) Motions to be heard 2:00 p.m. on October 18, 2010.

19
20 DATED: May 26, 2010

KEKER AND VAN NEST LLP

21
22 By /s/ Daniel Nazer

DANIEL PURCELL

AJAY S. KRISHAN

DANIEL K. NAZER

Attorneys For Plaintiffs

DEREK E. TURNER and

MARI TOBAN BLOME

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DATED: May 26, 2010

OFFICE OF THE ATTORNEY
GENERAL OF CALIFORNIA

By /s/ John Devine

EDMUND G. BROWN
PAUL T. HAMMERNESS
JOHN P. DEVINE
Attorneys For Defendants
CHP OFFICERS KRIS LAFOND,
MARGARET PLANKA, and DANIEL
SCHNEIDER

Filer's Attestation: Pursuant to General
Order No. 45, Section X.B. regarding
nonfiling signatories, Daniel K. Nazer
hereby attests that concurrence in the filing
of this stipulation has been obtained by
John P. Devine

DATED: May 26, 2010

HANSON BRIDGETT LLP

By: /s/ Julie Veit

KIMON MANOLIUS
JULIA H. VEIT
SOPHIA B. BELLOI
MARGARET E. COHEN
Attorneys for Defendant
GOLDEN GATE BRIDGE, HIGHWAY
AND TRANSPORTATION DISTRICT

Filer's Attestation: Pursuant to General
Order No. 45, Section X.B. regarding
nonfiling signatories, Daniel K. Nazer
hereby attests that concurrence in the filing
of this stipulation has been obtained by
Julia H. Veit

5/27/2010



1 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

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3 Dated: May ____, 2010

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MARILYN HALL PATEL
United States District Court Judge

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