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 14 [Refer to signature page for the complete list of parties represented]

14 UNITED STATES DISTRICT COURT
 15 NORTHERN DISTRICT OF CALIFORNIA

17	FREDDIE M. DAVIS,)	Case No. C09-02629 SI
)	
18	Plaintiff,)	STIPULATION AND [PROPOSED]
)	ORDER TO MODIFY CASE
19	v.)	MANAGEMENT ORDER
)	
20	PRISON HEALTH SERVICES; et al.,)	[FRCP 16(b)(4)]
)	
21)	
)	
22	Defendants.)	

23
 24 Pursuant to Federal Rule of Civil Procedure 16(b)(4), Plaintiff Freddie M. Davis and
 25 Defendants County of Alameda, James E. Ayala, and Darryl Griffith hereby stipulate as follows:

26 WHEREAS, the Court's current Case Management Order sets the following schedule for
 27 expert discovery: Expert Disclosures, August 5, 2011, Rebuttal Disclosures August 19, 2011, and
 Expert Discovery Cut-off September 9, 2011; and

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WHEREAS, Plaintiff Freddie Davis' mother, a resident of Birmingham, Alabama, is gravely ill in hospice; and

WHEREAS, the forensic psychologist retained by Plaintiff has had insufficient time with Ms. Davis to complete the requisite extensive psychological testing and interviewing because Ms. Davis has had to travel to Alabama to be at her mother's bedside during recent weeks; and

WHEREAS, based upon good cause shown, the parties request that the Court extend expert disclosure and discovery deadlines;

WHEREAS, the parties have previously requested three modifications of the Case Management Order by stipulation;

NOW, THEREFORE, THE PARTIES HEREBY STIPULATE AND AGREE, based on the foregoing circumstances, to request that the Court establish the following modified deadlines:

Expert Disclosures	August 15, 2011
Rebuttal Expert Disclosures	August 29, 2011
Expert Discovery Cut-Off	September 19, 2011

Dated: _____ /s/ _____
FANIA E. DAVIS
Attorney for Plaintiff
FREDDIE M. DAVIS

Dated: _____ /s/ _____
LYNNE G. STOCKER
ANDRADA & ASSOCIATES
Attorneys for Defendants
COUNTY OF ALAMEDA, JAMES E. AYALA,
And DARRYL GRIFFITH

IT IS SO ORDERED.

Dated: 8/11/11 _____

SUSAN ILLSTON
United States District Judge