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11
 12 UNITED STATES DISTRICT COURT
 13 NORTHERN DISTRICT OF CALIFORNIA

14
 15 LUZ HERNANDEZ,
 16 Plaintiff,
 vs.
 17 CITY OF NAPA, et al.,
 18 Defendants.

Case No.: C09-2782 EDL

**STIPULATION AND ~~PROPOSED~~ ORDER
 CONTINUING THE HEARING DATES FOR
 PLAINTIFF'S MOTION TO COMPEL
 DISCOVERY AND THE CITY OF NAPA'S
 MOTION TO BIFURCATE MONELL
 DISCOVERY AND TRIAL**

19
 20 IT IS HEREBY STIPULATED by the parties hereto, through their respective undersigned
 21 attorneys of record, that the date for the hearing on the plaintiff's motion to compel discovery against
 22 the City of Napa and the defendant City of Napa's motion to bifurcate Monell discovery and trial be
 23 continued from Tuesday, June 22 to Tuesday, July 20, 2010. Since the completion of ENE on April
 24 22, 2010, the parties have continuously met and conferred and cooperated in good faith on resolving
 25 all non-Monell discovery matters. On Tuesday June 1 the parties and their respective computer
 26 experts met and conferred on a proposal to allow plaintiff's computer expert to conduct a forensic
 27 examination on the Napa Police Department server for documents and emails that discuss, refer or
 28 relate to the incident and events more fully set forth in the second amended complaint on file. The

1 parties need additional time to complete the meet and confer process on the proposal and draft the
2 appropriate stipulations and orders to accommodate this discovery. The parties continue to
3 cooperate on discovery matters including depositions, records subpoenas and related matters. An
4 extension of the remaining briefing schedule and hearing dates for both discovery motions will allow
5 the parties time to complete this meet and confer process.

6 The parties further stipulate to extend the date for supplemental Rule 26 disclosures to Friday
7 July 2, 2010 based on the ongoing meet and confer process.

8 The parties have also stipulated that all depositions noticed before July 2, 2010 may be
9 completed after July 2, 2010 at a mutually convenient date and time for all parties.

10 And because of the ongoing meet and confer on discovery the parties have stipulated that
11 expert disclosures be extended to August 31 with expert discovery to be completed within 30 days.

12 Based on the good faith meet and confer to date Plaintiff herein also withdraws her request for
13 sanctions included in her notice of motion against these defendants.

14 So Stipulated.

15
16 Dated: June 3, 2010

LAW OFFICES OF TIM A. PORI

17
18 By: _____/s/
19 TIM A. PORI
20 Attorneys for Plaintiff LUZ HERNANDEZ

21 Dated: June 3, 2010

BERTRAND, FOX & ELLIOT

22
23 By: _____/s/
24 GREGORY M. FOX
25 Attorneys for Defendants
26 CITY OF NAPA, RICHARD MELTON, and
27 GARTH BENDER
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