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 16 STATE COMPENSATION INSURANCE FUND

17 UNITED STATES DISTRICT COURT

18 NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION

19
 20 STATE COMPENSATION INSURANCE
 FUND,

21 Plaintiff,

22 vs.

23 METROPOLITAN WEST SECURITIES
 24 LLC; WACHOVIA BANK, N.A.; DOES
 1 through 10, inclusive; and DOES 11
 25 through 20, inclusive,

26 Defendants.

CASE NO. CV 09-02959 JSW (EDL)

**STIPULATION AND [~~PROPOSED~~] ORDER
 CONTINUING CASE DEADLINES
 AS MODIFIED**

27
 28 CASE NO. CV 09-2959 JSW (EDL)

STIPULATION AND [~~PROPOSED~~] ORDER CONTINUING CASE DEADLINES

1 WHEREAS the Court entered a stipulated order on December 21, 2010 providing the
2 following case schedule:

3	Fact discovery cutoff:	May 25, 2011
4	Disclosure of experts and reports:	June 1, 2011
5	Disclosure of rebuttal experts and reports:	June 20, 2011
6	Expert discovery cutoff:	July 13, 2011
7	Completion of mediation:	August 12, 2010
8	Dispositive motion hearing date:	August 26, 2011
9	Final pretrial conference:	October 17, 2011
10	Trial:	November 7, 2011

11 WHEREAS the parties have been diligently engaged in discovery, including significant
12 written discovery, third-party subpoenas, and the production of both paper and electronic
13 documents (to date approximately 850,000 pages of documents have been produced);

14 WHEREAS the parties stipulated to a discovery order entered by the Magistrate Judge on
15 January 3, 2011 on cross-motions to compel, requiring substantial additional productions which
16 are still being completed;

17 WHEREAS the parties have issued several third-party subpoenas (primarily out of state)
18 which are outstanding or still the subject of meet-and-confer efforts;

19 WHEREAS the parties are discussing a stipulation for the filing of an amended complaint
20 (not adding new parties) and amended answer, and the draft of the proposed amended complaint
21 is being reviewed by Defendants;

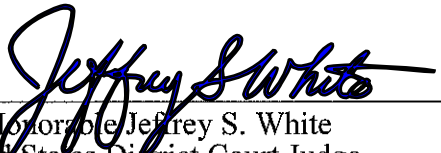
22 WHEREAS the parties have been engaged in discussions about cooperatively scheduling
23 non-expert depositions, which have raised a number of issues requiring more time for resolution,
24 including: the need for depositions in at least four different cities, including on the East Coast; the
25 agreement of the parties to arrange for several of their former officers and employees to make
26 themselves available for deposition; a number of depositions of other non-party and non-affiliated
27 witnesses will be taken; and Defendants have requested that Plaintiff stipulate to permit them to
28 exceed the 10 deposition limit;

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PURSUANT TO STIPULATION, IT IS SO ORDERED:

DATED: April 18, 2011



The Honorable Jeffrey S. White
United States District Court Judge