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 UNIFIED SCHOOL DISTRICT, BARBARA  
 7 WILSON AND PERCY MCGEE

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**UNITED STATES DISTRICT COURT**

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**NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

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TIM GALLI,  
 Plaintiff,

CASE NO. 3:09-cv-03775-JSW

13

vs.

**JOINT STIPULATION AND ~~PROPOSED~~  
 ORDER CONTINUING DEPOSITION  
 AND DISPOSITIVE MOTION  
 DEADLINES**

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PITTSBURG UNIFIED SCHOOL  
 DISTRICT, BARBARA WILSON AND  
 16 PERCY MCGEE,

Trial Date: July 25, 2011

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Defendant.

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**SUBJECT TO THE APPROVAL OF THIS COURT, THE PARTIES HEREBY**

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**STIPULATE TO THE FOLLOWING:**

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WHEREAS, the parties reached a tentative settlement agreement, pending approval of the  
 22 Pittsburg Unified School District's ("District") Board of Trustees ("Board"), at the settlement  
 23 conference before United States Magistrate Judge Bernard Zimmerman on Thursday, February 10,  
 24 2011 ; and

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WHEREAS, the District's Board will consider the settlement agreement at its regularly  
 26 scheduled meeting on March 9, 2011; and

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WHEREAS, the parties do not wish to incur further attorneys fees and costs associated  
 28 with this matter, including but not limited to completing current discovery and drafting dispositive

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1 motions, prior to the Board's consideration of the settlement agreement on March 9, 2011.

2 NOW THEREFORE, THE PARTIES HEREBY STIPULATE to continue the deadline to  
3 complete all currently noticed depositions to March 16, 2011; and

4 THE PARTIES FURTHER STIPULATE to continue the deadline to file dispositive  
5 motions to April 1, 2011; and

6 THE PARTIES FURTHER STIPULATE to continue the hearing on all dispositive  
7 motions to ~~May 6, 2011~~ May 13, 2011; and

8 THE PARTIES FURTHER STIPULATE that all other scheduled dates shall remain the  
9 same.

10 **SO STIPULATED.**

11 DATED: February 15, 2011

Respectfully submitted,

FAGEN FRIEDMAN & FULFROST, LLP

14 By: /s/ Roy A. Combs  
15 Roy A. Combs  
16 Attorneys for Defendants PITTSBURG UNIFIED  
17 SCHOOL DISTRICT, BARBARA WILSON  
AND PERCY MCGEE

18 DATED: February 15, 2011

Respectfully submitted,

THE VENARDI LAW FIRM

21 By: /s/ Mark L. Venardi  
22 Mark L. Venardi  
23 Attorneys for Plaintiff TIM GALLI

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~~PROPOSED~~ ORDER

IT IS HEREBY ORDERED, pursuant to the above Stipulation of the parties, that the deadline to complete all depositions, both expert depositions and non-expert depositions, be continued to March 16, 2011.

IT IS FURTHER ORDERED, pursuant to the above Stipulation of the parties, that the deadline to file dispositive motions be continued to April 1, 2011; and

IT IS FURTHER ORDERED, pursuant to the above Stipulation of the parties, that the hearing on all dispositive motions be continued to ~~May 6, 2011~~ May 13, 2011 at 9:00 a.m.

DATED: February 15, 2011

  
\_\_\_\_\_  
Hon. Jeffrey S. White  
UNITED STATES DISTRICT JUDGE

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