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 6 CITY AND COUNTY OF SAN FRANCISCO  
 and RONALD M. CHOY  
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 12

13 UNITED STATES DISTRICT COURT  
 14 NORTHERN DISTRICT OF CALIFORNIA

15 LEOPOLDO PAZ-HERRERA,  
 16 Plaintiff,  
 17 vs.  
 18 CITY AND COUNTY OF SAN  
 FRANCISCO; RONALD M. CHOY and  
 19 DOES 1-30,  
 20 Defendant.

Case No. C09-4795 MMC

**STIPULATION AND ~~PROPOSED~~ ORDER  
 CONTINUING FACT DISCOVERY 17 DAYS**

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 22  
 23 Plaintiff Leopoldo Paz-Herrera (“Plaintiff”) and Defendants City & County of San Francisco  
 24 and Ronald M. Choy (“Defendants”), by and through their respective counsel, hereby stipulate and  
 25 agree to continue fact discovery in this action from August 2, 2010 to August 19, 2010 to  
 26 accommodate witnesses and allow both parties to complete their discovery.

27 This stipulation is necessary in order to enable plaintiff to conduct a Rule 30(b)(6) deposition  
 28 of the City that was timely noticed several weeks ago but delayed through no fault of plaintiff’s

1 counsel, and also to enable plaintiff to receive additional documents from the City. This stipulation is  
2 also necessary to allow the City to take a deposition of a Paramedic/EMT that was timely noticed  
3 several weeks ago but had to be continued through no fault of defense counsel. The parties have now  
4 scheduled the previously-noticed Paramedic/EMT deposition for August 18, 2010 and the previously-  
5 noticed Rule 30(b)(6) deposition for August 19, 2010.

6 Dated: July 28, 2010

7 DENNIS J. HERRERA  
8 City Attorney  
9 JOANNE HOEPER  
10 Chief Trial Deputy  
11 BLAKE P. LOEBS  
12 ANDREW M. GSCHWIND  
13 Deputy City Attorneys

14 By: \_\_\_\_\_ /s./  
15 ANDREW M. GSCHWIND  
16 Attorneys for Defendants

17 Dated: July 28, 2010


18 PAOLI & GEERHART, LLP

19 By: \_\_\_\_\_ /s./<sup>1</sup>  
20 CHARLES GEERHART  
21 Attorneys for Plaintiff

22 ~~PROPOSED~~ ORDER

23 PURSUANT TO STIPULATION, IT IS SO ORDERED: Fact discovery is continued to  
24 August 19, 2010.

25 Date: July 29, 2010

26 By:   
27 THE HON. MAXINE M. CHESNEY  
28 United States District Court Judge

<sup>1</sup> Per General Order 45, section X.B., I hereby attest that I have obtained the concurrence, consent and authorization of Mr. Geerhart to file this document on his behalf.