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11 Attorneys for Defendant
 12 DUC NGUYEN, M.D.

13 UNITED STATES DISTRICT COURT
 14 NORTHERN DISTRICT OF CALIFORNIA

16 JOHN TIMOTHY PEREZ,

17 Plaintiff,

18 vs.

19 D. NGUYEN, DR. BOWMAN, P. LA DUKE,
 20 S.S.A. JONES, B. FRINTZ

21 Defendants.

Case No. 09-4939 JSW (KAW)

**JOINT STIPULATION AND
 [PROPOSED] ORDER TO CONTINUE
 DISCOVERY DATES**

Action Filed: October 16, 2009

1 The Parties to the above entitled action, Dr. Duc Nguyen (“Defendant”) and John
2 Timothy Perez (“Plaintiff”) (collectively referred to herein as the “Parties”), by and through their
3 undersigned counsel, hereby stipulate and agree as follows:

4 1. WHEREAS, on June 19, 2013, the Court ordered that the trial date be continued
5 to April 8, 2014, the last day to hear dispositive motions be continued to January 10, 2014 at
6 9:00 a.m., and the start of jury selection be continued to April 2, 2014 at 8:00 a.m.;

7 2. WHEREAS, on June 19, 2013, the Court stated that all pre-trial motion dates,
8 discovery deadlines and expert discovery deadlines will be reset in accordance with the new trial
9 date;

10 3. WHEREAS, the Parties have met and conferred and have agreed to stipulate to a
11 the following discovery and expert discovery deadlines in accordance with this new trial date:

- 12 a. Close of fact discovery: November 7, 2013;
- 13 b. Deadline for expert disclosures: December 6, 2013; and
- 14 c. Close of expert discovery: January 17, 2014.

15 **NOW THEREFORE**, all Parties hereto stipulate and agree that the Court may enter an
16 Order resetting the close of fact discovery to November 7, 2013, deadline for expert disclosures
17 to December 6, 2013 and the close of expert discovery to January 17, 2014.

18
19 **IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.**

20
21 DATED: July 8, 2013

SEYFARTH SHAW LLP

22
23 By: /s/ Ari Hersher
24 Francis J. Ortman III
25 Ari Hersher
26 Matthew J. Mason
27 Courtney K. Bohl
28 Attorneys for Plaintiff
JOHN TIMOTHY PEREZ

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DATED: July 8, 2013

ANDRADA & ASSOCIATES

By: /s/ Matthew W. Roman
 J. Randall Andrada
 Matthew W. Roman
Attorneys for Defendant
DUC NGUYEN, M.D.

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[PROPOSED] ORDER

~~[Proposed Order]~~ The following discovery deadlines, and expert discovery deadlines will be reset as follows:


Close of fact discovery: November 7, 2013

Deadline for Expert Disclosures: December 6, 2013

Close of Expert Discovery: January 17, 2014

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: July 8, 2013



Hon. Jeffrey S. White
United States District Judge