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23 UNITED STATES DISTRICT COURT
24 NORTHERN DISTRICT OF CALIFORNIA

25 JOHN TIMOTHY PEREZ,
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27 Plaintiff,
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29 v.
30
31 D. NGUYEN, et al.
32
33 Defendants.

Case No.: 3:09-cv-04939-JSW

**JOINT STIPULATION AND
[PROPOSED] ORDER TO CONTINUE
EXPERT DISCOVERY DEADLINES**

Trial Date: June 23, 2014

ANDRADA & ASSOCIATES
PROFESSIONAL CORPORATION

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

4 1. WHEREAS, the expert disclosure date is currently February 14, 2014 and the
5 deadline to complete expert discovery is March 14, 2014.
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7 2. WHEREAS, the Parties are continuing to engage in settlement talks;

8 3. WHEREAS, the Parties have agreed to conduct a second mediation with Judge
9 Kandis Westmore which is scheduled for March 7, 2014;

10 4. WHEREAS, the Parties believe that the costs and expenses associated with expert
11 witnesses may be avoid if the Parties can reach a negotiated settlement;

12 5. WHEREAS, the Parties have met and conferred, and have agreed to extend the expert
13 disclosure deadline until April 7, 2014 and the close of expert discovery until May 9, 2014.
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15 6. WHEREAS, extending the deadlines for expert disclosures and discovery will not
16 result in change to subsequent deadlines regarding the June 23, 2014 trial date.

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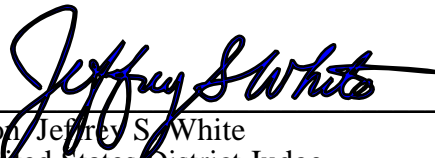
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[PROPOSED] ORDER

PURSUANT TO STIPULATION, AND GOOD CAUSE APPEARING, IT IS SO ORDERED that the expert disclosure deadline is continued until April 7, 2014 and the expert discovery deadline is continued until May 9, 2014.

DATED: February 13, 2014



Hon. Jeffrey S. White
United States District Judge

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