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14 CITY AND COUNTY OF SAN FRANCISCO

15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA

17 SHAWN L. WILLIAMS,
18 Plaintiff,
19 vs.

Case No. CV 09-5063 JSW

**STIPULATION AND ~~PROPOSED~~ ORDER
TO LIFT LIMITATIONS ON DISCOVERY
AND CONTINUE PRE-TRIAL AND TRIAL
DATES**

20 CITY AND COUNTY OF SAN
FRANCISCO, HUMAN SERVICES
21 AGENCY, DEPARTMENT OF HUMAN
RESOURCES, DEPARTMENT OF AGING
22 AND ADULT SERVICES; SERVICE
EMPLOYEES INTERNATIONAL UNION;
23 GEORGE DIAS, Chief Shop Steward,
SERVICE EMPLOYEES INTERNATIONAL
24 UNION; JONATHAN WRIGHT, an Agent
and Official, SERVICE EMPLOYEES
25 INTERNATIONAL UNION; DOES 1
THROUGH 25,
26 Defendants.

1 Plaintiff Shawn L. Williams (“Plaintiff”), Defendant City and County of San Francisco (“City”
2 or “Defendant”) and Defendants Service Employees International Union, Local 1021 (“SEIU”),
3 Jonathan Wright (“Wright”) and George Diaz (“Wright”) hereby submit a stipulation and proposed
4 order. The parties stipulate to the following:

- 5 1. The parties jointly request that the Court lift any existing limitations on discovery;
- 6 2. All parties jointly request that the pre-trial and trial dates be extended by approximately
7 three (3) months, as set forth in the proposed order.

8 The parties respectfully submit that there is good cause to make these two requests. With
9 regard to the first request, this Court limited the amount of discovery the parties could conduct prior to
10 the mediation. The parties engaged in mediation on or about July 13, 2010, before the court-appointed
11 mediator Alan R. Berkowitz. The mediation did not result in a settlement agreement. The parties now
12 wish to proceed with discovery.

13 With regard to the second request, the parties are cognizant that the close of non-expert
14 discovery is this Friday, August 13, 2010. Prior to the mediation, Defendants took only the partial
15 deposition of Plaintiff. Defendant City took a partial deposition of Plaintiff on March 23, and April 1,
16 2010. On April 5, 2010, Defendants SEIU, Wright and Diaz took a partial deposition of Plaintiff. The
17 parties agreed to continue Plaintiff’s deposition after the mediation, in the event that the case did not
18 settle. The Defendants now require additional time to complete Plaintiff’s deposition. Additionally,
19 all parties require additional time to complete discovery.

20 Defendants anticipate taking the depositions of any relevant experts disclosed by Plaintiff.
21 Defendants also plan to subpoena records from third parties, including the EEOC and DFEH.
22 Defendants may subpoena documents from additional third parties, if necessary, as discovery proceeds
23 in this case. Defendants anticipate depositions of possible third party witnesses identified in Plaintiff’s
24 deposition.

25 Plaintiff anticipates taking the depositions of some of Defendants’ witnesses identified in
26 initial disclosures.

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1 Further Case Management Conference: _____.

2 **IT IS SO ORDERED.**

3 Dated: August 12, 2010

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HONORABLE JEFFREY S. WHITE
UNITED STATES DISTRICT JUDGE

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