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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 EXTEND NON-EXPERT DISCOVERY
CUT-OFF**

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 **The parties jointly request that the Court extend the non-expert discovery cut-off by**
6 **three (3) weeks, to December 3, 2010.**

7 The parties respectfully submit that there is good cause to make this request. The parties are
8 cognizant that the close of non-expert discovery is this Friday, November 12, 2010. Plaintiff has not
9 conducted depositions as of the date of the filing of this stipulation and proposed order. Plaintiff
10 anticipates taking the depositions of some of Defendants’ witnesses identified in initial disclosures.
11 Defendants SEIU, Diaz and Wright require additional time to serve a deposition subpoena on a third-
12 party witness, Lashenna Sirles, and thereafter take her deposition. Her deposition was originally
13 scheduled for November 10, 2010, but her home address of record is no longer current and the process
14 server has been unable to effectuate service at her work address. Defendant City may wish to continue
15 the deposition of Plaintiff in light of the fact that Plaintiff produced to Defendant City hundreds of
16 pages of documents at a deposition on November 8, 2010. Defendant City requires time to review the
17 newly produced documents and determine whether a further deposition of Plaintiff is necessary. In
18 summary, all parties require additional time to complete non-expert discovery.

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