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14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA

18 DEBRA TAYLOR JOHNSON,
19 Plaintiff,
20 vs.
21 CITY OF OAKLAND,
22 Defendant.

Case No.: C09-05157 RS (EDL)
**JOINT STIPULATION AND [PROPOSED]
ORDER RE: BRIEFING SCHEDULE FOR
DEFENDANT'S MOTION TO COMPEL
AND FOR PLAINTIFF'S MOTION TO
QUASH, MOTION FOR SANCTIONS, AND
MOTION TO COMPEL.**
AS MODIFIED
Dept: 15th Floor, Courtroom E
Judge: Hon. Elizabeth D. Laporte

Complaint Filed: October 30, 2009
Trial Date: March 14, 2011

RENNE SLOAN HOLTZMAN SAKAI LLP
Attorneys at Law

1 This Stipulation is made between Plaintiff Debra Taylor Johnson (“Johnson” or “Plaintiff”) and
2 Defendant City of Oakland (“City” or “Defendant”), by and through their respective counsel of record,
3 with respect to the following facts:
4

5 WHEREAS, the close of discovery is set for November 11, 2010;
6

7 WHEREAS, the deadline for filing dispositive motions is November 19, 2010;
8

9 WHEREAS, Defendant’s Motion to Compel (“Motion to Compel”) under the Local Rules,
10 would be scheduled to be heard on November 16, 2010 at 9:00 a.m. in Courtroom E, 15th Floor before
11 the Honorable Elizabeth L. Laporte;
12

13 WHEREAS, Defendant’s Motion to Compel seeks additional deposition testimony from
14 Plaintiff, and will therefore require, if granted, sufficient time to schedule a deposition prior to the
15 November 11, 2010 close of discovery.
16

17 WHEREAS, the parties have met and conferred on this issue and have stipulated to the
18 following hearing and briefing schedule for Defendant’s Motion to Compel:

- 19 • The moving papers must be filed and served by October 8, 2010;
- 20 • The opposition papers must be filed and served by October 22, 2010;
- 21 • The reply papers must be filed and served by October 26, 2010; and
- 22 • The hearing on Defendant’s Motion to Compel will be set for November 2, 2010 at 9:00
23 a.m. in Courtroom E, 15th Floor before the Honorable Elizabeth L. Laporte;
24

25 WHEREAS, Plaintiff anticipates filing a Motion to Quash, a Motion for Sanctions and possibly
26 a Motion to Compel which under the Local Rules, would be scheduled to be heard after the November
27 19, 2010 deadline for filing dispositive motions.
28

1 WHEREAS, the parties have met and conferred on this issue and have stipulated to the
2 following hearing and briefing schedule for Plaintiff's above referenced motions:

- 3 • The moving papers must be filed and served by October 15, 2010;
- 4 • The opposition papers must be filed and served by October 29, 2010;
- 5 • The reply papers must be filed and served by November 3, 2010; and
- 6 • The hearing on Defendant's Motion to Compel will be set for November 9, 2010 at 9:00
7 a.m. in Courtroom E, 15th Floor before the Honorable Elizabeth L. Laporte;

8
9 WHEREAS, the parties believe these proposals are appropriate because if it is adopted by the
10 Court, then no further modifications to the current case schedule would be required.

11
12 WHEREAS, for the foregoing reasons, the parties respectfully request that the Court approve
13 the above stipulation and issue an order setting the briefing and hearing schedule.

14
15 **IT IS SO STIPULATED.**

16 Dated: 10/7/10

LAW OFFICES OF SHEILA THOMAS

17
18 By: / S /
19 Sheila Y. Thomas
20 Attorneys for Plaintiff

21
22 Dated: 10/8/10

RENNE SLOAN HOLTZMAN SAKAI LLP

23
24 By: K. R. O'Donnell
25 Kerry R. O'Donnell
26 Attorneys for City of Oakland
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RENNE SLOAN HOLTZMAN SAKAI LLP
Attorneys at Law

ORDER

Pursuant to the above Stipulation of the parties, and good cause appearing therefore,

IT IS HEREBY ORDERED that Defendant's Motion to Compel shall be filed no later than October 8, 2010. Plaintiff shall file any opposition no later than October 22, 2010. Defendant's reply shall be filed no later than October 26, 2010. IT IS FURTHER ORDERED that the hearing on Defendant's Motion to Compel will be heard on November 2, 2010 at 9:00 a.m. in Courtroom E, 15th Floor before the Honorable Elizabeth L. Laporte.

IT IS HEREBY ORDERED that Plaintiff's Motion to Quash, Motion for Sanctions and Motion to Compel (if one is filed) shall be filed no later than October 15, 2010. Defendant shall file any opposition no later than October 29, 2010. Plaintiff's reply shall be filed no later than November 3, 2010. IT IS FURTHER ORDERED that the hearing on Plaintiff's above-reference motions will be heard on November 9, 2010 at 9:00 a.m. in Courtroom E, 15th Floor before the Honorable Elizabeth L. Laporte.

IT IS SO ORDERED.

Dated: October 12, 2010

Elizabeth D. Laporte

ELIZABETH D. LAPORTE
UNITED STATES MAGISTRATE JUDGE

RENNE SLOAN HOLTZMAN SAKAI LLP
Attorneys at Law