1 2 3 4	Oakland, CA 94618 3 Telephone: (510) 339-3739 Facsimile: (510) 339-3723		
5	5 Attorney for Plaintiff Debra Taylor Johnson		
6	5		
7	UNITED STATES DISTRICT COURT		
8	NORTHERN DISTRICT OF CALIFORNIA		
9	9		
10		ase No. C09-05157 RS (EDL)	
11		ase No. C09-05157 NS (LDL)	
12		<b>FIPULATION BETWEEN THE</b>	
13	3 j P2	ARTIES TO PERMIT CONTINUED EPOSITIONS OF HOWARD JORDAN	
14	4 ) A	ND DEBRA TAYLOR JOHNSON FTER DISCOVERY CUTOFF	
15	-	AND ORDER THEREON	
16	6 j		
17	7   )		
18	Whereas, Assistant Chief of the Oakland Police Department, Howard Jordan, was		
19	deposed by Plaintiff on October 26, 2010;		
20	Whereas, following the deposition of Assistant Chief Jordan, and while searching for		
21	documents responsive to Plaintiff's Third Request for Production of Documents, Defendant		
22	located additional documents which were produced to	located additional documents which were produced to Plaintiff on October 29, 2010;	
23	1		
24	Assistant Chief Jordan;		
25	Whereas, Defendant City of Oakland has agreed to permit Plaintiff an opportunity to		
26	6 further depose Assistant Chief Jordan to ask questions		
27	produced, within the time limit remaining for his depo	produced, within the time limit remaining for his deposition under Fed Rule of Civ. Proc. 30(d);	
28	Whereas, Assistant Chief Jordan is not available for deposition prior to the discovery		
	STIPULATI	ON	

1	cut-off date of November 11, 2010 on a date when Plaintiff's counsel is also available;		
2	Whereas, Defendant offered the following dates for the continued deposition of Assistant		
3	Chief Jordan: November 11, 15 and 18, 2010;		
4	Whereas, the parties have agreed to schedule Assistant Chief. Jordan's deposition for		
5	November 15, 2010 beginning at 2:00 p.m.;		
6	FURTHERMORE,		
7	Whereas, on November 8, 2010, Judge Laporte granted Defendant's Motion to Compel		
8	further deposition testimony from Plaintiff for a further three and a half hours of testimony; and		
9	Whereas, the parties have agreed to schedule Ms. Johnson's deposition for November 15,		
10	2010 beginning at 8:30 a.m.;		
11	The parties, Plaintiff Debra Taylor Johnson and Defendant City of Oakland, therefore,		
12 13	acting through their respective counsel, hereby stipulate that Plaintiff may continue the		
13	deposition of Howard Jordan on November 15, 2010 and that Defendant may continue the		
14	deposition of Debra Taylor Johnson on November 15, 2010.		
16			
17	IT IS SO STIPULATED.		
18	Dated: November 8, 2010	RENNE SLOAN HOLTZMAN SAKAI LLP	
19			
20	By:	<u>/S/</u>	
21		Steven Shaw Attorneys for Defendant City of Oakland	
22		Automoys for Defendant City of Oukland	
23	Dated: November 8, 2010	LAW OFFICES OF SHEILA THOMAS	
24			
25	By:	<u>/S</u> /	
26			
27		Sheila Y. Thomas Attorney for Plaintiff Debra Taylor Johnson	
28			

## **STIPULATION**

1	PURSUANT TO THE STIPULATION, IT IS SO ORDERED.	
2		
3	DATED: November 10, 2010	
4	ELIZABETH LAPORTE	
5	UNITED STATES DISTRICT COURT MAGISTRATE JUDGE	
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