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10 Attorney for Defendants
 11 CITY OF SAN LEANDRO, POLICE CHIEF IAN R. WILLIS,
 12 DETECTIVE GOODMAN, DETECTIVE RAMSEY,
 13 OFFICER L. BRANDT, OFFICER GUILLEN, and DET. SGT. DeCOSTA

14 UNITED STATES DISTRICT COURT
 15 NORTHERN DISTRICT OF CALIFORNIA

16 KATHY LEE,

17 Plaintiff,

18 v.

19 CITY OF SAN LEANDRO, IAN R. WILLIS,
 20 in his official capacity as Chief of Police in San
 21 Leandro, OFFICER DEBORAH TRUJILLO
 22 (#297), individually and in her official capacity,
 23 SAN LEANDRO POLICE DEPARTMENT,
 24 DETECTIVE GOODMAN (#282), individually
 25 and in his official capacity, DETECTIVE
 26 RAMSEY (#307), individually and in his
 27 official capacity, OFFICER L. BRANDT
 28 (#273), individually and in his official capacity,
 OFFICER GUILLEN (#291), individually and
 in his official capacity, DET. SGT. DeCOSTA
 (#234), individually and in his official capacity,
 and DOES 1-40,

Defendants.

Case No: C 10-00104 MMC

**STIPULATION TO CONTINUE DATES
 CONTAINED IN CASE MANAGEMENT
 AND PRETRIAL ORDER;
 [PROPOSED] ORDER**

First Amended Complaint Filed:
 April 5, 2010

1 COMES NOW Plaintiff Kathy Lee and Defendants City of San Leandro, Ian R. Willis, Officer
2 Deborah Trujillo, Detective Goodman, Detective Ramsey, Officer L. Brandt, Officer Guillen, Det. Sgt.
3 DeCosta (collectively "Defendants"), and present the following Stipulation;

4 WHEREAS due to the schedule of counsel for Plaintiff, there has been the need for additional
5 time to complete discovery, and the parties therefore stipulate to the brief extension set forth below to
6 allow them to complete the necessary discovery;

7 WHEREAS none of the suggested changes will affect the Court's scheduled deadlines;

8 WHEREAS the Court's August 13, 2010 Case Management and Pretrial Order sets forth the
9 following dates and deadlines:

10 Completion of non-expert discovery: February 18, 2011;

11 Expert disclosure: March 11, 2011;

12 Completion of expert discovery: April 15, 2011;

13 Filing of dispositive motions: April 29, 2011;

14 Settlement Conference: February 2011, according to Court's availability;

15 Pretrial Conference: July 19, 2011;

16 IT IS HEREBY STIPULATED by Plaintiffs and Defendants that they request the Court to
17 modify its Case Management and Pretrial Order to set the following dates and deadlines, or soon
18 thereafter as practicable:

19 Completion of non-expert discovery: April 1, 2011;

20 Expert disclosure: April 15, 2011;

21 Completion of expert discovery: April 29, 2011;

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1 Dated: February 2, 2011

Respectfully submitted,

2 MEYERS, NAVE, RIBACK, SILVER & WILSON

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4
5 By: _____ /S/

6 Matthew A. Lavrinets
7 Attorneys for Defendants
8 CITY OF SAN LEANDRO, POLICE CHIEF IAN R.
9 WILLIS, DETECTIVE GOODMAN, DETECTIVE
10 RAMSEY, OFFICER L. BRANDT, OFFICER
11 GUILLEN, and DET. SGT. DeCOSTA

12 Dated: February 2, 2011

LAW OFFICE OF STEPHEN M. FUERCH

13 By: _____ /S/

14 Stephen M. Fuerch
15 Attorneys for Defendant DEBORAH TRUJILLO

16 Dated: February 2, 2011

LAW OFFICE OF RUSSELL A. ROBINSON

17
18
19 By: _____ /S/

20 Russell A. Robinson
21 Attorneys for Plaintiff KATHY LEE

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23 IT IS SO ORDERED

24
25
26 Dated: February 7, 2011

27 
United States District Judge

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