

1 MELINDA HAAG (CABN 132612)  
 United States Attorney  
 2 JOANN M. SWANSON (CSBN 88143)  
 Chief, Civil Division  
 3 MELISSA K. B. SLADDEN (CSBN 203307)  
 Assistant United States Attorney  
 4 450 Golden Gate Avenue, Box 36055  
 San Francisco, California 94102-3495  
 5 Telephone: (415) 436-6962  
 FAX: (415) 436-6748  
 6 melissa.sladden@usdoj.gov

7 Attorneys for Defendant

8 UNITED STATES DISTRICT COURT  
 9 NORTHERN DISTRICT OF CALIFORNIA  
 10 SAN FRANCISCO DIVISION  
 11

12 ROBERT SMITH, )  
 )  
 13 Plaintiff, )  
 )  
 14 v. )  
 )  
 15 UNITED STATES OF AMERICA, )  
 )  
 16 Defendant. )

No. C-10-00212 WHA

**STIPULATION AND ~~PROPOSED~~  
 ORDER TO EXTEND THE EXPERT  
 DISCOVERY CUT OFF**

17  
 18  
 19  
 20  
 21  
 22  
 23  
 24  
 25  
 26  
 27  
 28

1 **STIPULATION**

2 The parties, plaintiff Robert Smith (“Plaintiff”) and defendant, United States of America  
3 (“Federal Defendant”) by and through their respective attorneys stipulate as follows:

4 WHEREAS, pursuant to the current Case Management Order and Reference to ADR Unit  
5 for Mediation (“Case Management Order”) all rebuttal expert reports are due on January 20,  
6 2012 and expert discovery currently closes on February 3, 2012.

7 WHEREAS, counsel for the undersigned will be out of the country from January 26  
8 through February 3, 2012,

9 WHEREAS, the parties do not believe that expert discovery can be completed within the  
10 time allotted even with utmost diligence,

11 ACCORDINGLY, the parties hereby stipulate as follows the close of expert discovery  
12 shall be extended to February 17, 2012.

13 SO STIPULATED.

14 DATED: January 6, 2012

Respectfully submitted,

15  
16 MELINDA HAAG

17 United States Attorney

18 /s Melissa Sladden

19 \_\_\_\_\_  
20 MELISSA BROWN SLADDEN  
Assistant United States Attorney

21 PATRICIA A. TURNAGE  
22 Law Offices of Patricia A. Turnage

23 /s Patricia Turnage

24 (Signature on file)

25 DATED: January 6, 2012

26 \_\_\_\_\_  
PATRICIA TURNAGE  
Attorney for Plaintiff

27

28

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

~~PROPOSED~~ ORDER

The close of expert discovery in this action shall be extended from February 3, 2012 to February 17, 2011. No further extensions will be granted.

**IT IS SO ORDERED.**

Dated: January 10, 2012.



---

William Alsup  
UNITED STATES DISTRICT JUDGE