FOSTERemploymentlaw 3000 Lakeshore Avenue Oakland, California 94610	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16			
	17 18	DOES 1 through 15, Defendants.) FOR AN ORDER BY ALL PARTIES) EXTENDING THE DEADLINE FOR) EXCHANGE OF FACT DISCOVERY 	
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	21)	
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	23	1. Defendants CITY OF OAKLAND, JENNIFER RAY, JOSEPH TORRES, JOHN		
	24	FARRELL and GERALD A. SIMON ("Defendants") and Plaintiff RONALD EL-MALIK CURTIS		
	25	("Plaintiff") (hereinafter referred to collectively as "the parties") hereby stipulate to extend the		
	26	deadline for the exchange of fact discovery.		
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		STIPULATION BY ALL PARTIES TO EX	1 TEND THE DEADLINE FOR FACT DISCOVERY Dockets.Justia.com	

1	2. In the interests of justic	ce, and for good cause, the parties agree to extend fact			
2	discovery in light of counsel for Defendants, Madelyn Jordan-Davis' unexpected medical leave. Ms.				
3	Davis is the lead counsel for Defendants and due to her earlier unplanned absence there has been a				
4	significant delay in the exchange of discovery. The parties hereby agree that if discovery closed on				
5	April 1, 2011 then the trial will not be able to proceed on its full merits, as much of the factual				
6	investigation and discovery that is necessary for both parties has not been completed. Accordingly,				
7	in the interest of justice, the parties hereby stipulate and respectfully request the Court enter an order				
8	extending the deadline for the exchange of fact discovery from April 1, 2011 to September 30, 2011.				
9					
10	IT IS SO STIPULATED.				
11	Dated: June 6, 2011	PRICE AND ASSOCIATES			
12					
13		/s/			
14		Pamela Y. Price Jacqueline Lindsey			
15		Attorneys for Plaintiff RONALD EL-MALIK CURTIS			
16		KOWALD EL-WALIK CORTIS			
17	Dated: June 6, 2011	FOSTER EMPLOYMENT LAW			
18					
19		/s/			
20		Michael W. Foster Madelyn G. Jordan-Davis			
21		Attorneys for Defendants CITY OF OAKLAND, OAKLAND FIRE			
22		DEPARTMENT, JENNIFER RAY, JOSEPH TORRES, JOHN FARRELL AND			
23		GERALD A. SIMON			
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	2 STIPULATION BY ALL PARTIES TO EXTEND THE DEADLINE FOR FACT DISCOVERY				

	1	[P ROPOSED] ORDER
	2	Having read and considered the Stipulation and Joint Request for an Order Extending the
	3	Discovery Deadline and GOOD CAUSE APPEARING therefore, IT IS HEREBY ORDERED that
	4	the discovery deadline be reset to September 30, 2011. Counsel for Defendants shall promptly serve
	5	a copy of this Order on Plaintiff's counsel.
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	7	DATED: 6/20/11
	8	UNITED STATES DISTRICT JUDGE
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		3 STIPULATION BY ALL PARTIES TO EXTEND THE DEADLINE FOR FACT DISCOVERY