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UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

DESMOND J. DICKERSON,

Action No. C-10-00435-JSW

Plaintiff,

**STIPULATION AND ~~PROPOSED~~ ORDER FOR
 EXTENSION OF TIME TO DISCLOSE EXPERTS
 AND EXPERT REPORTS; AND TO EXTEND TIME
 TO COMPLETE EXPERT DISCOVERY**

vs.

CITY OF OAKLAND, a municipal corporation;
 WAYNE G. TUCKER, in his capacity as Chief
 of Police for CITY OF OAKLAND; JASON
 MITCHELL, JOSEPH FORMAN, JASON FONG,
 individually, and in their capacity as police officers
 for CITY OF OAKLAND; and, DOES 1-25,
 inclusive,

_____ /
 Defendants.

STIPULATION

All parties to this action stipulate and agree, by and through their respective counsel,
 as follows:

1. That the following good cause exists for extending the time for disclosure of expert witnesses and expert reports; for extending the time for expert discovery to be completed; and for extending the cut-off date for hearing of dispositive motions;

2. Judge Larson was originally the Magistrate Judge with whom there was to be a Settlement Conference in this case. It was scheduled for on August 27, 2011. Since the retirement of Judge Larson from this Court, Magistrate Judge Jacqueline Scott Corley has been assigned as the Magistrate Judge who will schedule and preside at Settlement Conference in this case. The date of September 2, 2011 has been selected for the Settlement Conference;

3. By extending the time for disclosure of expert witnesses and expert reports; and extending the time for expert discovery to be completed, the parties may not have to bear the cost of retaining experts, should the case settle prior to the requested new extended dates for expert disclosure and discovery;

4. As set forth in the Court's Order, dated 5-25-11, the Pretrial Conference is scheduled for 11-14-11 at 2:00 p.m., and the scheduled date for Trial is 12-5-11 at 8:00 a.m.. Therefore, the parties' request for extension of deadlines should not interfere with the presently scheduled pretrial and trial dates set by the Court; and,

5. For all the good cause reasons stated above, the parties respectfully request, that the following dates set forth in the Court's Order, dated 5-25-11, be extended, as follows:

(A) That the date for disclosure of expert witnesses and expert reports be extended from August 3, 2011 to October 12, 2011;

(B) That the cut-off date for completion of expert discovery be extended from August 17, 2011 to November 3, 2011; and,

(C) That the last date to hear dispositive motions be extended from September 9, 2011 at 9:00 a.m. to October 20, 2011. ~~October 21, 2011 at 9:00 a.m.~~

LAW OFFICES OF GAYLA B. LIBET

Dated: 8-2-11 By: /s/ Gayla B. Libet, Esq.
GAYLA B. LIBET, Esq.
Attorneys for Plaintiff

LAW OFFICES OF JOHN L. BURRIS

Dated: 8-2-11 By: /s/ John L. Burris
JOHN L. BURRIS, Esq.
Attorneys for Plaintiff

OFFICE OF THE OAKLAND CITY ATTORNEY

Dated: 8-2-11 By: /s/ Arlene M. Rosen, Esq.
ARLENE M. ROSEN, Esq.
Attorneys for Defendants

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: August 2, 2011


HONORABLE JEFFREY S. WHITE
United States District Court Judge