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 8 Attorneys for Plaintiffs,  
 CYNTHIA JOHNSON and JAMONT JOHNSON

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

12 CYNTHIA JOHNSON and JAMONT  
 13 JOHNSON, as individuals,

14 Plaintiffs,

15 vs.

16 COUNTY OF ALAMEDA, a public entity,  
 17 ALAMEDA COUNTY SHERIFF'S  
 OFFICE, a department of the County of  
 18 Alameda, ALAMEDA COUNTY  
 SHERIFF'S OFFICE DETENTION AND  
 19 CORRECTION DIVISION, a department of  
 the County of Alameda, DEPUTY SHERIFF  
 KEITH W. GILKERSON, an individual, and  
 20 DOES 1-50, inclusive,

21 Defendants.

Case No. CV-101437 RS

**STIPULATION CONTINUING  
 DEADLINE TO COMPLETE  
 DISCOVERY AND TO HEAR PRE-  
 TRIAL MOTIONS AS MODIFIED BY THE  
 COURT**

22  
 23 Plaintiffs, CYNTHIA JOHNSON and JAMONT JOHNSON ("Plaintiffs") and  
 24 Defendants, COUNTY OF ALAMEDA, ALAMEDA COUNTY SHERIFF'S OFFICE,  
 25 ALAMEDA COUNTY SHERIFF'S OFFICE DETENTION AND CORRECTION DIVISION,  
 26 and DEPUTY SHERIFF KEITH W. GILKERSON ("Defendants"), by and through their  
 27 respective attorneys of record, hereby stipulate as follows:

1           1.       On January 10, 2011, the Court approved the parties' stipulation to complete all  
2 non-expert discovery on or before April 29, 2011 and that all pre-trial motions be heard no later  
3 than June 29, 2011.

4           2.       The parties are in the process of conducting discovery and have stipulated to a  
5 settlement conference in an effort to resolve this case. Subsequent to the parties' stipulation  
6 continuing the deadlines to complete non-expert discovery, the Court granted the parties' request  
7 to be referred to Magistrate Judge Joseph Spero for a settlement conference. In light of the date  
8 ordered for the settlement conference (April 7, 2011), the parties took key depositions of Plaintiff  
9 Cynthia Johnson and Defendant Deputy Keith Gilkerson, but in the interest of enhancing  
10 settlement prospects, agreed to defer other non-essential discovery until after the settlement  
11 conference. This will prevent the parties from incurring substantial fees and costs prior to  
12 settlement.

13           3.       The parties have agreed to continue the deadline to complete all non-expert  
14 discovery from April 29, 2011 to June 15, 2011.

15           4.       The parties have further agreed that May 13, 2011 shall be the last day to disclose  
16 experts.

17           5.       The parties have also agreed that expert discovery shall close on June 30, 2011.

18           6.       In light of these continued dates, the parties have further agreed to continue the  
19 deadline to hear all potentially dispositive pre-trial motions from June 29, 2011 to ~~July 8,~~  
20 ~~July 7,~~

21 IT IS SO STIPULATED.

22 DATED: February 25, 2011

McMANIS FAULKNER

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24                               /s/ Ruby H. Kazi

JAMES McMANIS  
RUBY H. KAZI

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26                               Attorneys for Plaintiffs,  
27                               CYNTHIA JOHNSON and JAMONT  
                                  JOHNSON

1 DATED: February 25, 2011

BERTRAND, FOX & ELLIOT

2  
3 /s/ Michael C. Wenzel  
MICHAEL C. WENZEL

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5 Attorneys for Defendants,  
6 COUNTY OF ALAMEDA, ALAMEDA  
7 COUNTY SHERIFF'S OFFICE,  
8 ALAMEDA COUNTY SHERIFF'S  
9 OFFICE DETENTION AND  
10 CORRECTION DIVISION, and DEPUTY  
11 SHERIFF KEITH W. GILKERSON

12 **ORDER**

13 GOOD CAUSE APPEARING THEREFORE, and the parties having stipulated to same,  
14 the parties' stipulation is hereby APPROVED. The deadline to complete all non-expert  
15 discovery is continued from April 29, 2011 to June 15, 2011. The deadline to disclose experts is  
16 May 13, 2011 and expert discovery shall close on June 30, 2011. The deadline to hear all  
17 potentially dispositive pre-trial motions is continued from June 29, 2011 to ~~July 8,~~ 2011.  
18 July 7,

19 **IT IS SO ORDERED.**

20  
21  
22 DATED: 2/28/11

23   
24 UNITED STATES DISTRICT JUDGE