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6 Attorneys for Defendants
 COUNTY OF ALAMEDA
 7 and DEPUTY SHERIFF KEITH W. GILKERSON

8 UNITED STATES DISTRICT COURT
 9
 10 NORTHERN DISTRICT OF CALIFORNIA

11 CYNTHIA JOHNSON AND JAMONT) Case No.: CV 101437 RS
 12 JOHNSON, as individuals)

13 Plaintiffs,
 14 vs.

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

20 Defendants.

) **STIPULATION AND [PROPOSED] ORDER**
) **TO EXTEND EXPERT DISCOVERY**
) **DEADLINES**

) Complaint filed: April 5, 2010
) Trial date: August 15, 2011

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

1 On February 28, 2011, the Court approved the parties' stipulation to complete all non-expert
2 discovery on or before June 15, 2011, to disclose experts by May 13, 2011, to close expert discovery
3 on June 30, 2011, and to have all pre-trial motions be heard no later than July 7, 2011.

4 The parties attended a settlement conference before Judge Joseph Spero on April 7, 2011. The
5 case did not resolve. At the conclusion of the settlement conference, defendants said they would be
6 filing a motion for summary judgment and the parties agreed, at the suggestion of Judge Spero, to
7 return for a further settlement conference with Judge Spero after the motion for summary judgment
8 was heard.

9 Defendants' motion for summary judgment is set for hearing on June 2, 2011.

10 It does not appear Judge Spero's schedule will permit a settlement conference to be scheduled
11 before August 8, 2011, and therefore the parties are contemplating private mediation for a date in
12 early to mid-June, after the hearing on defendants' motion for summary judgment.

13 The parties have further agreed to continue the deadline to disclose experts from May 13,
14 2011 until June 17, 2011. The parties have also agreed that expert discovery shall close on July 8,
15 2011.

16 Good cause exists to continue the deadlines as set forth above given defendants' pending
17 motion and given the parties' intent to participate in further ADR prior to incurring expert fees and
18 costs.

19 **IT IS SO STIPULATED.**

20 Dated: May 5, 2011

McMANIS FAULKNER

21
22 By: /s/ Ruby H. Kazi
23 JAMES McMANIS
24 RUBY H. KAZI
25 Attorneys for Plaintiffs
26 CYNTHIA JOHNSON and
27 JAMONT JOHNSON
28

1 Dated: May 5, 2011

BERTRAND, FOX & ELLIOT

3 By: /s/ Michael C. Wenzel

4 Thomas F. Bertrand
5 Richard W. Osman
6 Michael C. Wenzel
7 Attorney for Defendants
8 COUNTY OF ALAMEDA, ALAMEDA COUNTY
9 SHERIFF'S OFFICE, ALAMEDA COUNTY
10 SHERIFF'S OFFICE DETENTION and
11 CORRECTION DIVISION, DEPUTY SHERIFF
12 KEITH W. GILKERSON

10 **ORDER**

11 GOOD CAUSE APPEARING THEREFOR, and the parties having stipulated to same, the
12 parties' stipulation is hereby APPROVED. The deadline to disclose experts is June 17, 2011 and
13 expert discovery shall close on July 8, 2011.

14 **IT IS SO ORDERED.**

16 Dated: 5/6, 2011

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16 UNITED STATES DISTRICT COURT JUDGE