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11 Attorneys for Plaintiffs,
 12 CYNTHIA JOHNSON and JAMONT JOHNSON

13 UNITED STATES DISTRICT COURT
 14 NORTHERN DISTRICT OF CALIFORNIA
 15 SAN FRANCISCO DIVISION

16 CYNTHIA JOHNSON and JAMONT
 17 JOHNSON, as individuals,

18 Plaintiffs,

19 vs.

20 COUNTY OF ALAMEDA, a public entity,
 21 ALAMEDA COUNTY SHERIFF'S
 22 OFFICE, a department of the County of
 23 Alameda, ALAMEDA COUNTY
 24 SHERIFF'S OFFICE DETENTION AND
 25 CORRECTION DIVISION, a department of
 26 the County of Alameda, DEPUTY SHERIFF
 27 KEITH W. GILKERSON, an individual, and
 28 DOES 1-50, inclusive,

Defendants.

Case No. CV-101437 RS

**STIPULATION AND [PROPOSED]
 ORDER CONTINUING DEADLINES
 TO COMPLETE DISCOVERY**

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

1 1. On February 28, 2011, the Court approved the parties' stipulation to complete all
2 non-expert discovery on or before June 15, 2011.

3 2. On May 6, 2011, the Court approved the parties' stipulation that June 17, 2011,
4 would be the last day to disclose experts and July 8, 2011, would be the date for the close of
5 expert discovery.

6 3. The parties appeared before the Court on June 2, 2011 for oral argument on
7 defendants' motion for summary judgment and plaintiffs' motion seeking leave to amend the
8 complaint.

9 4. The parties are awaiting the Court's rulings on both motions. In light of this, and
10 in contemplation of reaching an agreement to engage in further settlement efforts, the parties
11 have agreed to defer taking some of the depositions already noticed prior to the pending June 15,
12 2011 discovery cutoff. This will prevent the parties from incurring substantial fees and costs that
13 may prove unnecessary and/or will also allow them to take more targeted depositions based on
14 the Court's rulings on the two pending motions.

15 5. The parties have therefore agreed to continue the deadline to complete all
16 depositions properly noticed before the June 15, 2011, discovery cutoff to July 15, 2011. The
17 parties have agreed to no other modification of the pending non-expert discovery cutoff of June
18 15, 2011.

19 6. The parties have further agreed that July 15, 2011, shall be the last day to disclose
20 experts.

21 7. The parties have also agreed that expert discovery shall close on July 29, 2011.

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1 8. The parties respectfully request that the Court approve this stipulation and
2 incorporate its terms in an order.

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4 **IT IS SO STIPULATED.**

5 DATED: June 14, 2011

McMANIS FAULKNER

6 /s/ Ruby Kazi

7 JAMES McMANIS
8 RUBY H. KAZI

9 Attorneys for Plaintiffs,
10 CYNTHIA JOHNSON and JAMONT
11 JOHNSON

12 DATED: June 14, 2011

BERTRAND, FOX & ELLIOT

13 /s/ Michael Wenzel

14 MICHAEL C. WENZEL

15 Attorneys for Defendants,
16 COUNTY OF ALAMEDA, ALAMEDA
17 COUNTY SHERIFF'S OFFICE,
18 ALAMEDA COUNTY SHERIFF'S
19 OFFICE DETENTION AND
20 CORRECTION DIVISION, and DEPUTY
21 SHERIFF KEITH W. GILKERSON

22 **ORDER**

23 GOOD CAUSE APPEARING THEREFOR, and the parties' having stipulated to same,
24 the parties' stipulation is hereby APPROVED. The deadline to complete depositions noticed
25 prior to the June 15, 2011, non-expert discovery cutoff is July 15, 2011. The deadline to disclose
26 experts is July 15, 2011, and expert discovery shall close on July 29, 2011.

27 **IT IS SO ORDERED.**

28 DATED: 6/14/11



UNITED STATES DISTRICT JUDGE