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1 SHARON L. ANDERSON (SBN 94814) County Counsel JANET L. HOLMES (SBN 107639) 2 Deputy County Counsel COUNTY OF CONTRA COSTA 3 651 Pine Street, 9th Floor Martinez, California 94553 4 Telephone: (925) 335-1800 Facsimile: (925) 335-1866 5 Email: jholm@cc.cccounty.us 6 Attorneys for Defendants 7 COUNTY OF CONTRA COSTA and WARREN RUPF, SHERIFF 8 9 IN THE UNITED STATES DISTRICT COURT 10 NORTHERN DISTRICT OF CALIFORNIA 11 12 No. CV 10-1454 JCS CHRISTOPHER HAMMOND et al., 13 STIPULATION AND [<del>PROPOSED</del>] ORDER Plaintiffs, 14 EXTENDING DEADLINES FOR DISCOVERY 15 COUNTY OF CONTRA COSTA. 16 ROBERT REICHERT, KEVIN Current CMC Date: March 11, 2011 MORRIS, SHERIFF WARREN E. RUPF Time: 1:30 p.m. 17 and DOES ONE to ONE HUNDRED, Courtroom: A inclusive., Trial Date: December 18 Defendants. 19 IT IS HEREBY STIPULATED by and between counsel for all parties in the above-20 referenced action: 21 WHEREAS, certain deadlines had been set by the court for completion of non-expert 22 and expert discovery (Doc. #20); and 23 WHEREAS, two mediators were assigned and then vacated (see Doc. ## 23,24,25,28) 24 before the third mediator was appointed November 22, 2010 (Doc. #29); and 25 WHEREAS, the deadline for mediation was extended by the court to and including 26 February 28, 2011 (Doc. #31); and 27 WHEREAS, in the interest of potentially saving the time and expense associated with 28

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completion of extensive discovery in the event the case could settle at mediation, counsel for 1 all parties deferred much discovery until after the mediation was completed; and 2 WHEREAS, despite good faith efforts of all involved, the case did not settle at the 3 mediation and certain discovery must now be completed; and 4 WHEREAS trial is set for December 5, 2011 (see Doc. #20), 5 Counsel for all parties hereby request that the DEADLINES FOR COMPLETION OF 6 DISCOVERY BE ADJUSTED TO THE FOLLOWING DATES: 7 June 1, 2011 Deadline for completion of non-expert discovery 8 Deadline for Service of Expert Disclosures June 15, 2011 9 June 24, 2001 Deadline for Service of Rebuttal Expert Disclosures 10 Deadline for completion of expert discovery July 11, 2011 11 12 13 DATE: March 4, 2011 SHARON L. ANDERSON COUNT 14 15 By: 16 Deputy County Counsel Attorneys for Defendants County and 17 18 19 DATE: March 4, 2011 MCNAMARA, NEY, BEATTY. SLATTERY, BORGÉS & BROTHERS, 20 LLP 21 By: 22 James Fitzgerald Attorneys for Defendants Reichert and 23 Morris 24 25 26 27 28

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