

FOSTER employmentlaw  
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Oakland, California 94610

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Attorneys for Defendants,  
CITY OF OAKLAND, HOWARD JORDAN  
and SEAN WHENT

**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA**

DERWIN LONGMIRE, ) Case No. C 10-01465 JSW  
)  
Plaintiff, ) (42 U.S.C. §§ 1981 and 1983)  
vs. )  
) Date Action Filed: April 7, 2010  
CITY OF OAKLAND, HOWARD )  
JORDAN, SEAN WHENT, and DOES 1- )  
50, inclusive, ) **STIPULATION AND [PROPOSED]**  
Defendant. ) **ORDER EXTENDING DEADLINE TO**  
) **FILE PLAINTIFF'S OPPOSITION TO**  
) **DEFENDANT'S MOTION FOR**  
) **SUMMARY JUDGMENT AND**  
) **EXTENDING EXPERT DISCLOSURE**  
) **AND EXPERT DISCOVERY DEADLINES**  
) **AS MODIFIED**

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STIPULATION EXTENDING DEADLINE TO FILE PLAINTIFF'S OPPOSITION TO  
DEFENDANT'S MOTION FOR SUMMARY JUDGMENT AND EXTENDING EXPERT  
DISCOVERY DEADLINES

1 IT IS HEREBY STIPULATED by and between counsel for all parties in the above-  
2 referenced action:

3 WHEREAS, the trial date in this matter is scheduled for February 27, 2012 and the hearing  
4 on defendant’s motion for summary judgment is scheduled for December 9, 2011;

5 WHEREAS, counsel for all parties require a short extension of time to comply with current  
6 case deadlines based on competing case obligations in other matters;

7 WHEREAS, counsel for all parties hereby stipulate and jointly request the Court to extend  
8 the deadline for plaintiff to file his opposition to defendant’s motion for summary judgment by five  
9 days from September 16, 2011 to September 21, 2011 and to extend the deadline for defendant to  
10 reply to October 12, 2011; and

11 WHEREAS, the parties hereby stipulate and jointly request an order extending the currently  
12 set expert discovery dates, such that the currently set expert disclosure date of September 16, 2011  
13 would be moved to September 21, 2011, and the currently set last day for expert discovery of  
14 September 27, 2011 would be moved to October 7, 2011.

15 All other deadlines shall remain in place.

16 Dated: September 16, 2011

FOSTER EMPLOYMENT LAW

17 /s/ Madelyn Jordan-Davis

18 Madelyn G. Jordan-Davis  
19 Attorneys for Defendants

20 Dated: September 16, 2011

SCOTT LAW FIRM

21 /s/ John Scott

22 John Scott  
23 Attorney for Plaintiff

24 Dated: September 16, 2011

LAW OFFICE OF JOHN L. BURRIS

25 /s/ John L. Burris

26 John L. Burris  
27 Attorney for Plaintiff

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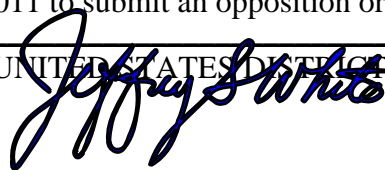
**[PROPOSED] ORDER**

Having read and considered the Stipulation continuing the trial date and corresponding  
NO  
deadlines in this action, and ~~GOOD~~ CAUSE APPEARING therefore, IT IS HEREBY ORDERED  
that the deadline to file plaintiff's opposition to defendant's motion for summary judgment in this  
September 19, 2011  
matter has been extended to ~~September 21~~, 2011. The deadline to file defendant's reply has been  
11  
extended to October ~~17~~, 2011. IT IS FURTHER ORDERED that expert disclosures are due on

September 21, 2011, and the last day for expert discovery is moved to October 7, 2011.  
In its last order granting the parties' second stipulation for an extension of time on briefing, the Court  
stated that there would no further extensions of time. This third request is filed on the due date of the  
opposition. Plaintiff shall have until September 19, 2011 to submit an opposition or it shall be struck.

DATED: ~~September 16~~, 2011

UNITED STATES DISTRICT JUDGE



**F O S T E R** employmentlaw  
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