

1 BRODSKY MICKLOW BULL & WEISS LLP
 Eugene A. Brodsky, State Bar No. 36691
 2 Edward M. Bull III, State Bar No. 141996
 3 384 Embarcadero West, Suite 200
 Oakland, California 94607-3704
 Telephone: (510) 268-6180
 4 Facsimile: (510) 268-6181

5 Attorneys for Plaintiff,
 Donna Deloise Moore

7 Tony West
 Assistant Attorney General
 8 Melinda L. Haag
 United States Attorney
 9 R. Michael Underhill
 Attorney in Charge, West Coast Office
 10 Torts Branch, Civil Division
 R. Scott Blaze
 11 Senior Admiralty Counsel
 Torts Branch, Civil Division
 12 U.S. Department of Justice
 P.O. Box 36028
 13 450 Golden Gate Avenue, Room 7-5395
 San Francisco, CA 94102-3463

14 Attorneys for Defendant
 15 United States of America

17 UNITED STATES DISTRICT COURT
 18 NORTHERN DISTRICT OF CALIFORNIA

20 DONNA DELOISE MOORE,

21 Plaintiff,

22 vs.

23 THE UNITED STATES OF AMERICA,
 24 *in personam*, CAPE HORN, its engines,
 25 tackle, apparel, furniture, etc., *in rem*

) CASE NO. CV 10-2193 SC

) AMENDED STIPULATION AND
) PROPOSED ORDER RE EXPERT
) DISCLOSURES AND REPORTS

26 _____)
 27 DONNA DELOISE MOORE (“Plaintiff”) and THE UNITED STATES OF

1 AMERICA (“Defendant”) jointly submit this Stipulation and Proposed Order
2 Regarding Expert Disclosures and Reports as follows:

3 WHEREAS in its STATUS CONFERENCE ORDER of January 7, 2011, the
4 Court set this mater for a bench trial on September 6, 2011; and

5 WHEREAS the Court did not set dates for expert disclosures or the exchange of
6 expert reports in its January 7, 2011 Order; and

7 WHEREAS the parties want an exchange date approved by the Court; and

8 WHEREAS the parties want to await the completion of discovery prior to the
9 first disclosure of expert information and reports by the Plaintiff;

10 WHEREFORE The parties HEREBY STIPULATE and request that the Court
11 order that expert disclosures and reports be exchanged by the parties as follows:

12 By Plaintiff: July 15, 2011

13 By Defendant: August 5, 2011.

14

15 DATED: July 1, 2011

BRODSKY MICKLOW BULL & WEISS LLP

16

By: /S/ Edward M. Bull III
Edward M. Bull III

17

Attorneys for Plaintiff
Donna Deloise Moore

18

19

20

21 DATED: July 1, 2011

U.S. Department of Justice
Torts Branch, Civil Division

22

By: /S/ R. Scott Blaze
R. Michael Underhill
R. Scott Blaze

23

24

Attorneys for Defendant
United States of America

25

26

27

28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

~~[PROPOSED]~~

ORDER

Having considered the stipulation of counsel, and good cause appearing in support of their request, IT IS HEREBY ORDERED THAT expert disclosures and reports be exchanged by the parties as follows:

By Plaintiff: July 15, 2011.

By Defendant: August 5, 2011.

DATED: 7/5/11

HON. SAMUEL CONTI
UNITED STATES DISTRICT JUDGE



CERTIFICATE OF SIGNATURE

I attest that the content of this document is acceptable to attorney, R. Scott Blaze, and that he authorized me to sign the document on his behalf.

/s/ Edward M. Bull III