

1 **TODD H. MASTER [SBN: 185881]**
 2 **tmaster@hrmlaw.com**
 3 **HOWARD ROME MARTIN & RIDLEY LLP**
 4 1775 Woodside Road, Suite 200
 5 Redwood City, CA 94061
 6 Telephone: (650) 365-7715
 7 Facsimile: (650) 364-5297

8
 9
 10
 11
 12
 13
 14
 15
 16
 17
 18
 19
 20

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO

FRANCISCO VARGAS,
 Plaintiff,
 vs.
 CITY OF BRENTWOOD, et al.
 Defendants.

Case No. C10-02925 JSW (LB)

**STIPULATION AND ~~PROPOSED ORDER~~
 MODIFYING ORDER SCHEDULING
 TRIAL AND PRETRIAL MATTERS
 [DOCUMENT 19]**

STIPULATION

On March 15, 2011, the Court issued its Order Scheduling Trial and Pretrial Matters,
 scheduling the close of discovery as follows: Close of Non-Expert Discovery – September 26,

26
 STIPULATION AND PROPOSED ORDER MODIFYING ORDER SCHEDULING TRIAL AND PRETRIAL
 MATTERS [DOCUMENT 19]; Case No. C10-02925 JSW (LB)

HOWARD ROME MARTIN & RIDLEY LLP
 1775 WOODSIDE ROAD, SUITE 200
 REDWOOD CITY, CALIFORNIA 94061
 TELEPHONE (650) 365-7715

HOWARD ROME MARTIN & RIDLEY LLP
1775 WOODSIDE ROAD, SUITE 200
REDWOOD CITY, CALIFORNIA 94061
TELEPHONE (650) 365-7715

1 2011; Last day for Expert Disclosure – September 30, 2011; Last day for Expert Discovery –
2 October 28, 2011. *See* Order Scheduling Trial and Pretrial Matters [Document No. 19].

3 The parties subsequently engaged in discovery and on September 1, 2011 participated in a
4 settlement conference before Magistrate Judge Laurel Beeler. *See* Civil Minute Order [Document
5 No. 32]. While the matter did not resolve, Magistrate Beeler ordered the parties to return for a
6 further settlement conference on September 29, 2011. *Id.*

7 The parties and their attorneys respectfully request that the discovery deadlines set forth in
8 the Court’s Order Scheduling Trial and Pretrial Matters [Document No. 19] be modified as
9 follows:

- 10 • Close of Non-Expert Discovery – October 28, 2011;
- 11 • Last day for Expert Disclosure – November 4, 2011; and
- 12 • Last day for Expert Discovery – December 16, 2011

13 The parties agree that the extension of the non-expert discovery cut-off only applies to oral
14 depositions. The extension of the non-expert discovery cut-off does not apply to written discovery
15 or any request for documents accompanying any future notice of party/witness deposition as the
16 deadline for the service of written discovery has already passed.

17 This modification will not have any impact on other deadlines set forth in the Court’s Order
18 Scheduling Trial and Pretrial Matters and will provide the parties with another opportunity to
19 resolve the case with Magistrate Beeler on September 29, 2011 without having to incur further
20 costs and attorneys’ fees in advance.

21 Date: September 12, 2011

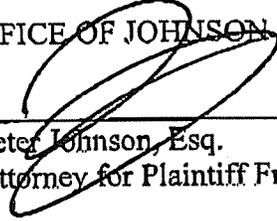
HOWARD ROME MARTIN & RIDLEY LLP

22
23 By: /s/ Todd H. Master
24 Todd H. Master
25 Attorneys for Said Defendants

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

Date: September __, 2011

LAW OFFICE OF JOHNSON & JOHNSON

By: 
Peter Johnson, Esq.
Attorney for Plaintiff Francisco Vargas

ORDER

Pursuant to the above facts and stipulation, it is hereby ordered that the Court's Order Scheduling Trial and Pretrial Matters [Document No. 19] is modified as stipulated by the parties herein.

Date: September 13, 2011

By: 
United States District Court Judge
Jeffrey S. White

HOWARD ROME MARTIN & RIDLEY LLP
1775 WOODSIDE ROAD, SUITE 200
REDWOOD CITY, CALIFORNIA 94061
TELEPHONE (650) 365-7715