

1 JAMES B. CHANIN (SBN# 76043)
JULIE M. HOUK (SBN 114968)
2 Law Offices of James B. Chanin
3050 Shattuck Avenue
3 Berkeley, California 94705
(510) 848-4752; FAX: (510) 848-5819
4 Email: jbcofc@aol.com

5 Attorney for Plaintiffs

6 UNITED STATES DISTRICT COURT
7 NORTHERN DISTRICT OF CALIFORNIA

9 SHARIFULLAH MAWLAVIZADA,

10 Plaintiff,

11 vs.

13 CITY OF HAYWARD, a municipal
corporation; DOES 1-100,

14 Defendants.
15

) CASE NO: C10-03253 MEJ

)
) **STIPULATION AND [PROPOSED]**
) **ORDER EXTENDING TIME FOR**
) **DISCLOSURE OF EXPERT WITNESS**
) **INFORMATION AND REPORTS AND**
) **FOR COMPLETION OF FACT AND**
) **EXPERT WITNESS DISCOVERY**
)

16
17 WHEREAS, the parties attended a lengthy Mediation session on March 16, 2011 which
18 was conducted by Thomas Bertrand, Esq. and have reached a tentative settlement of the entire
19 action, which is subject to approval by the City of Hayward;

20 WHEREAS, the City of Hayward anticipates that the final decision concerning approval
21 of the settlement should be made in April 2011;

22
23
24 Mawlavizada v. City of Hayward, Case No. C10-03253 MEJ
Stip. And Proposed Order Extending Discovery Cut-Off and Expert Disclosures


1 WHEREAS, the current deadline for the disclosure of expert witness information and
2 reports pursuant to F.R.C.P. 26 is April 15, 2011 and the current deadline for the close of fact
3 and expert discovery is May 10, 2011;

4 WHEREAS, the parties hope to avoid having to incur substantial expert witness and
5 discovery costs in light of the tentative settlement since these further expenses could adversely
6 affect settlement;

7 THE PARTIES, BY AND THROUGH THEIR RESPECTIVE COUNSEL OF
8 RECORD, DO HEREBY STIPULATE AND AGREE THAT the deadlines for the disclosure of
9 expert witness information and reports as well as for the completion of fact discovery should be
10 extended to June 15, 2011, and the deadline for completion of expert discovery should be
11 extended to July 15, 2011. Prior to this time, the parties have not requested any adjustments be
12 made with respect to discovery cut-off or expert disclosure deadlines.

13
14 IT IS SO STIPULATED:

15 Dated: March 18, 2011



Rafael E. Alvarado, Jr.
Attorney for Defendant City of Hayward

16
17 Dated: March 18, 2011

S/

James B. Chanin
Attorney for Plaintiff

18
19 PURSUANT TO STIPULATION,
20 IT IS SO ORDERED:

21 Dated: March 22, 2011



Maria-Elena James
Magistrate Judge