1 2 3 4 5	Zach Cowan, City Attorney, SBN 96372 Matthew J. Orebic, Deputy City Attorney, SBN 124491 Lynne S. Bourgault, Deputy City Attorney, SBN 180416 BERKELEY CITY ATTORNEY'S OFFICE 2180 Milvia Street, Fourth Floor Berkeley, CA 94704 Telephone: (510) 981-6998 Facsimile: (510) 981-6960 Email: morebic@ci.berkeley.ca.us		
6	lbourgault@ci.berkeley.ca.us		
7 8	Attorneys for Defendants CITY OF BERKELEY, DOUGLAS HAMBLETON, ALEXANDER McDOUGALL and ERIK KEENE		
9			
10	UNITED STATES DISTRICT COURT		
11	NORTHERN DISTRICT OF CALIFORNIA		
12	NADRA FOSTER,	No. C10-03703 SI (ADR)	
13	Plaintiff,	STIPULATION AND [RROPOSED] ORDER TO CONTINUE DEPOSITION OF DR. LISA LATTANZA BEYOND THE DISCOVERY CUT-OFF	
14	v. BERKELEY POLICE DEPARTMENT; et al.,		
15			
16	Defendants.		
17	Derendants.		
18			
19	The parties through their counsel herein stipulate that the deposition of Dr. Lisa Lattanza,		
20	a treating doctor for plaintiff, currently set for October 25, 2011 at 4:00 p.m. at UCSF Medical		
21	Center, 1500 Owens Street, First Floor, San Francisco, CA can be continued to November 22,		
22	2011 at 4:00 p.m. at the same location. The non-expert discovery cutoff is October 28, 2011.		
23	Defense counsel for City of Berkeley, Matthew Orebic, requests this continuance of the		
24	deposition to a date beyond the percipient witness discovery cutoff because (1) Mr. Orebic is		
25	needed at a medical procedure for his 88-year old mother that was recently scheduled on an		
26	expedited basis, (2) there is no other person or family member as appropriate as Mr. Orebic to		
27	transport and care for his mother on October 25, and (3) the next available date for Dr. Lattanza		
28	1		
	STIPULATION AND [PROPOSED] ORDER TO CONTINUE THE DEPOSITION OF DR. LISA LATTANZA BEYOND THE DISCOVERY CUT-OFF		

NO. C 10-03703 SI (ADR)

1	to give a deposition is November 22. Plaintiff's counsel is concerned that parties do not have		
2	the authority to make such a stipulation, but is amenable due to human concerns.		
3	Dated: October 19, 2011	Respectfully submitted:	
4 5		ZACH COWAN, City Attorney MATTHEW J. OREBIC, Deputy City Attorney LYNNE S. BOURGAULT, Deputy City Attorney	
6 7		By: /s/ Matthew J. Orebic MATTHEW J. OREBIC Attorneys for Defendants	
8		CITY OF BERKELEY, , DOUGLAS HAMBLETON, ALEXANDER McDOUGALL and ERIK KEENE	
9	Dated: October 19, 2011	Respectfully submitted:	
10	Dated. 00000119, 2011		
11		By: /s/ Arcolina Panto ARCOLINA PANTO Attorney for Plaintiff	
12		NADRA FOSTER	
13	Dated: October 19, 2011	Respectfully submitted:	
14	Dated. October 19, 2011	NGO LEGAL GROUP, A Professional Corp.	
15		NGO LEGAL OKOUF, A FIOIessional Corp.	
16		By: <u>/s/ Steve Ngo</u> STEVE NGO	
17 18		Attorney for Defendants LOIS WITHERS, KPFA, and PACIFICA FOUNDATION	
10			
20	PURSUANT TO STIPULATION,	IT IS SO ORDERED	
20			
21	Dated: 10/24/11	Juran Delaton	
22	Duidu	HONORABLE SUSAN ILLSTON	
23		Judge of the U.S. District Court	
2 4 25			
23 26			
20 27			
28			
20		2 O CONTINUE THE DEPOSITION OF DD. LIGA LATTANZA	
	STIPULATION AND [PROPOSED] ORDER TO CONTINUE THE DEPOSITION OF DR. LISA LATTANZA BEYOND THE DISCOVERY CUT-OFF NO. C 10-03703 SI (ADR)		