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9
 10 UNITED STATES DISTRICT COURT
 11 NORTHERN DISTRICT OF CALIFORNIA

12 NADRA FOSTER,
 13 Plaintiff,
 14 v.
 15 BERKELEY POLICE DEPARTMENT; et
 16 al.,
 17 Defendants.

No. C10-03703 SI (ADR)

STIPULATION AND [~~PROPOSED~~]
 ORDER TO CONTINUE DEPOSITION
 OF DR. LISA LATTANZA BEYOND THE
 DISCOVERY CUT-OFF

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 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
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