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 CONTRA COSTA COMMUNITY COLLEGE DISTRICT

7
 8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA

11 PETER BENKO and DANIEL CRUZ,)	Case No.: CV-10-04943 JCS
)	
12 Plaintiff,)	STIPULATION FOR EXTENSION OF TIME
13 vs.)	TO EXCHANGE INITIAL DISCLOSURES
)	
14 CONTRA COSTA COMMUNITY COLLEGE)	
DISTRICT,)	
)	
15 Defendant.)	
)	

17 **IT IS HEREBY STIPULATED** by and between plaintiffs PETER BENKO and DANIEL
 18 CRUZ, and defendant CONTRA COSTA COMMUNITY COLLEGE DISTRICT, through their
 19 respective undersigned counsel, that the deadline for the exchange of initial disclosures shall be
 20 February 11, 2011.

21 On November 1, 2010, the complaint was filed and a scheduling order setting initial case
 22 management deadlines was created. Pursuant to that scheduling order, the deadline for the parties to
 23 exchange initial disclosures was February 4, 2011.

24 Defendant was served on November 9, 2010. Pursuant to an agreement of counsel, defendant
 25 did not file its responsive pleading to the complaint until January 28, 2011. The parties have met and
 26 conferred on two separate occasions regarding the exchange of initial disclosures. Plaintiffs' lawsuit
 27 against the DISTRICT implicates decisions made by the DISTRICT following budgetary cuts at each
 28 College within the DISTRICT, and the collection and review of said documents is time consuming

1 and extensive.

2 Defense counsel has expressed concern with the present initial disclosure deadline in that it
3 will not be in position to locate and identify all potential documents appropriate for disclosure within
4 the time presently ordered.

5 For that reason, the parties have stipulated, subject to this Court's approval, to extend the
6 deadline to exchange initial disclosures through February 18, 2011.

7 It is therefore respectfully requested that the time to exchange initial disclosures be modified
8 from this Court's initial scheduling order such that disclosures shall be exchanged on February 18,
9 2011.

10 The parties stipulate that a copy of a signature transmitted by any electronic means including,
11 but not limited to, facsimile machine and scanned document transmitted via e-mail will have the same
12 force and effect as an original signature.

13
14 Dated: February 4, 2011

Dated: February 4, 2011

15 SUNDEEN, SALINA & PYLE

BERTRAND, FOX & ELLIOT

16 /s/ Hunter Pyle

/s/ Michael C. Wenzel

17 By: Hunter Pyle
18 Emily Bolt
19 Attorneys for Plaintiffs
PETER BENKO and DANIEL CRUZ

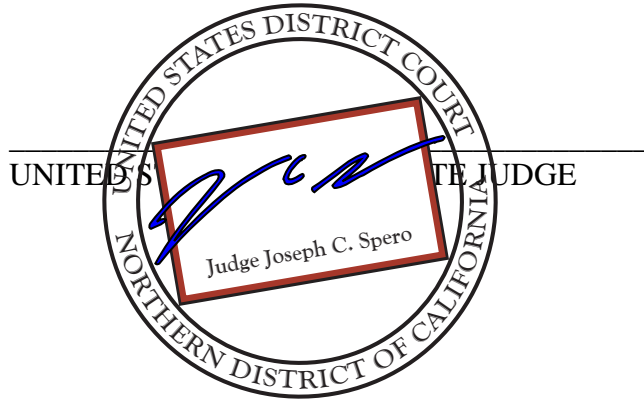
By: Michael C. Wenzel,
Attorneys for Defendant
CONTRA COSTA
COMMUNITY COLLEGE DISTRICT

ORDER

GOOD CAUSE APPEARING THEREFOR, the stipulation to continue the date to exchange initial disclosures in this matter from February 4, 2011 to February 18, 2011 is GRANTED.

IT IS SO ORDERED.

DATED: Feb. 7, 2011



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