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6 Attorneys for Defendants COUNTY OF SONOMA,
 SHERIFF BILL COGBILL and JOSHUA CLAASSEN
 7 (incorrectly sued herein as DEPUTY "CLAUSEN")

8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA

10 JULIO PALOMINO,

11 Plaintiff,

12 vs.

13 CALIFORNIA FORENSIC MEDICAL GROUP,
 DR. TAYLOR FITHIAN, COUNTY OF
 14 SONOMA, SHERIFF BILL COGBILL,
 DEPUTY "CLAUSEN" AND DOES 1-10,

15 Defendants.
 16

Case No.: 11-CV-1329 MEJ

STIPULATION AND ~~PROPOSED~~ ORDER
 EXTENDING DEADLINES FOR EXPERT
 DISCLOSURES AND EXPERT
 DISCOVERY

17 Plaintiff JULIO PALOMINO and defendants COUNTY OF SONOMA, SHERIFF BILL
 18 COGBILL and JOSHUA CLAASSEN (incorrectly sued herein as DEPUTY "CLAUSEN") hereby
 19 enter into this Stipulation Extending Deadlines For Expert Disclosures and Expert Discovery with
 20 reference to the following facts:

21 1. Pursuant to the October 13, 2011 Case Management Order filed in this case, the last
 22 day to disclose expert witnesses is December 7, 2012; the last day to disclose rebuttal expert
 23 witnesses is December 17, 2012; and the last day for expert discovery, including expert depositions,
 24 is January 1, 2013.

25 2. On October 31, 2012, defendants filed a Motion for Summary Judgment or, in the
 26 Alternative, Partial Summary Judgment. The Motion was originally set for hearing on December
 27 13, 2012, but the Court continued the hearing to December 20, 2012.
 28

1 3. The parties would like to continue the deadlines for expert disclosures and expert
2 discovery to dates after this Court will have ruled on the Motion, so the expense of expert discovery
3 can be avoided if the Motion is granted. An extension of the expert disclosure and discovery dates
4 will not affect any of the other pretrial dates scheduled by the Court's October 13, 2011 Case
5 Management Order.

6 IT IS HEREBY STIPULATED by and between the parties, through their attorneys of record,
7 that the dates for expert disclosures and the deadline for expert discovery shall be continued as
8 follows:

9 4. The parties shall disclose expert witnesses by January 15, 2013;

10 5. The parties shall disclose rebuttal expert witnesses by January 25, 2013;

11 6. Expert discovery shall be completed by February 15, 2013; and

12 7. The discovery cutoff date of January 1, 2013 shall remain in effect with respect to all
13 non-expert discovery.

14 DATED: December 5, 2012

EVAN LIVINGSTONE
Attorney for Plaintiff JULIO PALOMINO

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16
17 By: /s/ Evan Livingstone
Evan Livingstone

18 DATED: December 5, 2012

SPAULDING McCULLOUGH & TANSIL LLP
Attorneys for Defendants COUNTY OF SONOMA,
SHERIFF BILL COGBILL and JOSHUA
CLAASSEN (incorrectly sued herein as DEPUTY
"CLAUSEN")

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22 By: /s/Terry S. Sterling
Terry S. Sterling

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~~[PROPOSED]~~ ORDER

IT IS SO ORDERED



DATED: December 6, 2012

CHIEF UNITED STATES MAGISTRATE JUDGE
Maria-Elena James