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12 Attorneys for Defendant

13
 14 UNITED STATES DISTRICT COURT
 15 NORTHERN DISTRICT OF CALIFORNIA
 16 SAN FRANCISCO DIVISION

17 TRACEY THOMPSON,)
 18)
 Plaintiff,)
 19)
 v.)
 20)
 PATRICK R. DONAHOE, POSTMASTER)
 21 GENERAL OF THE UNITED STATES,)
 22)
 Defendant.)
 23)
 24)

Case No. C 11-1670 EDL

**STIPULATION AND ~~PROPOSED~~
 ORDER CONTINUING TRIAL AND
 TRIAL-RELATED DATES
 AS MODIFIED**

25 Plaintiff Tracey Thompson and Defendant Patrick R. Donahoe, Postmaster General of the
 26 United States, by and through their respective counsel of record, hereby stipulate as follows:

27 1. On April 6, 2011, Plaintiff, appearing *pro se*, commenced this action in the United
 28 States District Court for the Northern District of California. *See* Doc

STIPULATION AND [PROPOSED] ORDER CONTINUING TRIAL AND TRIAL-RELATED DATES
 CV 11-1670 EDL

1	Expert Discovery Cutoff	February 19, 2013
2	Last Day for Hearing on Dispositive Motions	April 23, 2013
3	Pretrial Conference	July 16, 2013
4	Trial	August 5, 2013

5 *See* Docket No. 66.

6 11. On or about October 25, 2012, Plaintiff filed a third notice of substitution of
7 counsel, replacing Dolores Victor with Keith Oliver. *See* Docket No. 67.

8 12. On November 16, 2012, and after meeting and conferring with Plaintiff’s counsel,
9 Defendant re-noticed the deposition of Plaintiff, which is scheduled to take place on December
10 12, 2012.

11 13. The parties wish to move this case forward in a timely fashion; however, the
12 frequent changes in Plaintiff’s representation, and its implications on the case, have resulted in a
13 delay in prosecution.

14 14. Based on the foregoing, the parties request the following continuances:

15	Initial Expert Disclosures	March 1, 2013
16	Rebuttal Expert Disclosures	March 22, 2013
17	Non-Expert Discovery Cutoff	April 12, 2013
18	Expert Discovery Cutoff	April 26, 2013
19	Last Day for Hearing on Dispositive Motions	June 18, 2013
20	Pretrial Conference	September 3, 2013, 2:00 p.m.
21	Trial	September 23, 2013

22 15. The parties have not made any prior requests to continue the trial date in this case.

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28 ///

1 DATED: November 30, 2012

Respectfully submitted,

2 OLIVERLawCorp

3 /s/ Keith Oliver

4 Keith R. Oliver
Attorney for Plaintiff

5 DATED: November 30, 2012

6 Respectfully submitted,
MELINDA HAAG
7 United States Attorney

8 /s/ Ann Marie Reding

9 ANN MARIE REDING
Assistant United States Attorney
10 Attorney for Defendant

11 ~~PROPOSED~~ ORDER AS MODIFIED

12 PURSUANT TO STIPULATION, IT IS SO ORDERED:

13 The Court vacates the original trial and trial-related dates and orders the following dates:

14 Initial Expert Disclosures	March 1, 2013
15 Rebuttal Expert Disclosures	March 22, 2013
16 Non-Expert Discovery Cutoff	April 12, 2013
17 Expert Discovery Cutoff	April 26, 2013
18 Last Day for Hearing on Dispositive Motions	June 18, 2013
19 Pretrial Conference	September 10 ¹⁰ , 2013, 2:00 p.m.
20 Trial	October 7, 2013 September 23, 2013

21 It is further ordered that the parties shall comply with the Standing Order for Civil
22 Case Practice in Cases Assigned for All Purposes to Magistrate Judge Laporte, a copy of which
23 is available from the Clerk of the Court and on the Court's website, with regard to the timing and
24 content of the Joint Pretrial Statement, and all other pretrial submissions.

25 Date: December 3, 2012

26 
27 HON. ELIZABETH D. LAPORTE
28 United States Magistrate Judge