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COUNTY OF SANTA CLARA, ANDREA  
7 BROLLINI, MICHELLE DE LA CALLE, and  
SANTA CLARA COUNTY PERSONNEL  
8 BOARD  
9

10 UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
11 (SAN FRANCISCO)  
12

13 KATHLEEN STALLWORTH,

14 Plaintiff,

15 v.

16 ANDREA BROLLINI, et al.,

17 Defendants.  
18

No. CV11-04841 JSW

**STIPULATION AND ~~PROPOSED~~ ORDER  
TO CONTINUE TRIAL AND ALL  
PRETRIAL DEADLINES  
AS MODIFIED HEREIN**

19 The parties in the above-captioned matter submit the following Stipulation and Proposed  
20 Order for the purpose of requesting that the Court continue the trial, presently set for April 1, 2013,  
21 to July 15, 2013.

22 Good cause exists for granting the requested continuance. Plaintiff's counsel recently  
23 noticed the depositions of seven employees of Santa Clara Valley Medical Center, five of whom  
24 work in the Emergency Department, and intends to notice additional employee depositions. To  
25 avoid a disruption in service in the Emergency Department and to accommodate the schedules of all  
26 of these employees, the parties anticipate needing until mid-November to complete these  
27 depositions. Additionally, disputes regarding written discovery responses have arisen, and the "meet  
28 and confer" process is ongoing. Finally, the dispositive motion cutoff of December 14, 2012 needs

Accordingly, the parties through their counsel stipulate to continue the trial date to July 15, 2013, and the pretrial conference to June 24, 2013. As for the remaining pretrial deadlines, a further Case Management Conference may be warranted, and the parties propose the following:

First Day to File Dispositive Motion: January 15, 2013.

Discovery Cutoff: Fact Cutoff – April 8, 2013.

**Last Day for Plaintiff to Disclose Expert Witnesses – April 8, 1013.**

Last Day for Defendants to Disclose Expert Witnesses – April 22, 2013.

Discovery Cutoff: Expert Cutoff– May 13, 2013.

**Last Day to Hear Dispositive Motions – March 8, 2013.**

I hereby attest that I have on file the holograph signature indicated by a “conformed” signature (/S/) within this efiled document.

Dated: September 24, 2012

Respectfully submitted,

LORI E. PEGG  
Acting County Counsel

By: \_\_\_\_\_ /S/  
MARY L. MALYSZ  
Deputy County Counsel

Attorneys for Defendants  
COUNTY OF SANTA CLARA, ANDREA  
BROLLINI, MICHELLE DE LA CALLE, and  
SANTA CLARA PERSONNEL BOARD

Dated: September 24, 2012

By: /S/  
BLAINE L. FIELDS

Attorney for Plaintiff  
KATHLEEN STALLWORTH

**ORDER CONTINUING THE TRIAL DATE**

The Court, having considered the stipulation of the parties and finding good cause, hereby orders that the trial date in this matter is continued to July 15, 2013, and the pretrial conference to June 24, 2013. The remaining pretrial deadlines are continued, as follows:

First Day to File Dispositive Motion – January 15, 2013.

Discovery Cutoff: Fact Cutoff – April 8, 2013.

Last Day for Plaintiff to Disclose Expert Witnesses – April 18, 2013.

Last Day for Defendants to Disclose Expert Witnesses – April 22, 2013.

Discovery Cutoff: Expert Cutoff – May 13, 2013.

Last Day to Hear Dispositive Motions – ~~March 8, 2013~~ **March 15, 2013**

**Jury selection will be held on July 10, 2013 at 8:00 a.m.**

Dated: September 25, 2012

  
JUDGE JEFFREY S. WHITE