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3/26/14

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17 WALTER JEFFERSON

18 UNITED STATES DISTRICT COURT

19 NORTHERN DISTRICT OF CALIFORNIA

20 WALTER JEFFERSON,

21 Plaintiff,

22 v.

23 THE CITY OF FREMONT, FREMONT  
24 TENNIS CENTER, JEFF GONCE, and Does 1  
through 10, inclusive,

25 Defendants.

Case No. 3:12-cv-00926 EMC

**STIPULATION OF COUNSEL AND  
[PROPOSED] ORDER TO EXTEND DEADLINE  
FOR DISPOSITIVE MOTIONS AND NON-  
EXPERT DISCOVERY CUT-OFF**

**Hon. Edward M. Chen**

1 Defendants City of Fremont, a municipal public entity on behalf of itself and the Fremont Tennis  
2 Center and Jeff Gonce, and Plaintiff Walter Jefferson hereby submit the following Stipulation and  
3 Proposed Order extending the time for dispositive motions and non-expert discovery cut-off.

4 WHEREAS on July 12, 2013, the Court issued a Case Management and Pre-Trial Order for Jury  
5 Trial ("Order"). Pursuant to the Order, the parties were to complete non-expert discovery by March 20,  
6 2014, and the last day for dispositive motions to be heard was June 12, 2014.

7 WHEREAS on February 20, 2014, at the Joint Status Conference, the parties notified the Court  
8 that plaintiff intended to take the deposition of Jeff Gonce and that Mr. Gonce's deposition could not be  
9 completed before the March 20, 2014 discovery cut-off deadline;

10 WHEREAS the parties have met and conferred and agreed that plaintiff will take the deposition  
11 of Jeff Gonce in Reno on May 28, 2014. The defendants also anticipate taking the depositions of Paul  
12 Concepcion and Sarah Robinson before May 28, 2014;

13 WHEREAS the parties have agreed that the last day for dispositive motions to be heard should be  
14 moved to July 31, 2014, in order to complete the above depositions and allow sufficient time to brief said  
15 motions.

16 IT IS HEREBY STIPULATED AND AGREED AS FOLLOWS:

17 The time to complete non-expert discovery shall be extended to May 30, 2014. The last day for  
18 dispositive motions to be heard shall be extended to July 31, 2014 at 1:30 p.m.

19 SO STIPULATED.

20  
21 Dated: March 20, 2014

BERTRAND, FOX & ELLIOT

22  
23 By: /s/ Ilana Kohn

24 Gregory M. Fox  
25 Ilana Kohn (Of Counsel)  
26 Attorneys for Defendants  
27 CITY OF FREMONT, FREMONT TENNIS  
28 CENTER, JEFF GONCE, JOE GRECH,  
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