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 19 CONTRA COSTA COUNTY

20 **UNITED STATES DISTRICT COURT**  
 21 **NORTHERN DISTRICT OF CALIFORNIA**

23 RETIREE SUPPORT GROUP OF CONTRA  
 COSTA COUNTY,  
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 Plaintiff,  
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 v.  
 26 CONTRA COSTA COUNTY,  
 27  
 Defendant.  
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CASE NO. C 12-00944 JST  
**STIPULATION EXTENDING CASE  
 DEADLINES AND ~~PROPOSED~~ ORDER**  
 Judge: Hon. Jon S. Tigar

- 1           1. The current Scheduling Orders provide the indicated case deadlines (Dkts. 91 and 97);
- 2           2. The parties have engaged in substantial discovery and there still remains a significant
- 3 amount of discovery to be completed before this case is ready for trial;
- 4           3. Plaintiff Retiree Support Group of Contra Costa County ("RSG") and Defendant Contra
- 5 Costa County (the "County") (collectively the "Parties") are currently exploring alternative
- 6 dispute resolution ("ADR") options in advance of the ADR conference scheduled for March 10,
- 7 2015;
- 8           4. The Parties wish to postpone for two weeks imminent discovery deadlines to allow the
- 9 Parties additional time to explore engaging in an ADR process which would be complex and time
- 10 consuming given the nature of this case;
- 11           5. Depending on further discussions, after the two week continuance, the Parties may
- 12 request an additional continuance of case deadlines and the trial date for approximately six months
- 13 to allow the Parties additional time to explore settlement through an alternative dispute resolution
- 14 procedure.;

15           The Parties, by and through their respective counsel of record, hereby stipulate and agree

16 that there is good cause to continue all case deadlines as follows pursuant to Federal Rule of Civil

17 Procedure 16 and Civil Local Rule 16-10 and request the Court approve and so order:

Event	Deadline
Fact discovery cut-off	3/20/15 to 4/3/15
Expert disclosures	2/23/15 to 3/9/15
Expert rebuttal	3/12/15 to 3/26/15
Expert discovery cut-off	4/9/15 to 4/23/15

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27           **IT IS SO STIPULATED.**

1 DATED: February 18, 2015

LEWIS, FEINBERG, LEE, RENAKER &  
JACKSON, P.C.

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*/s/ Andrew Lah*

By: \_\_\_\_\_  
ANDREW LAH  
Attorneys for Plaintiff  
RETIREE SUPPORT GROUP OF CONTRA  
COSTA COUNTY

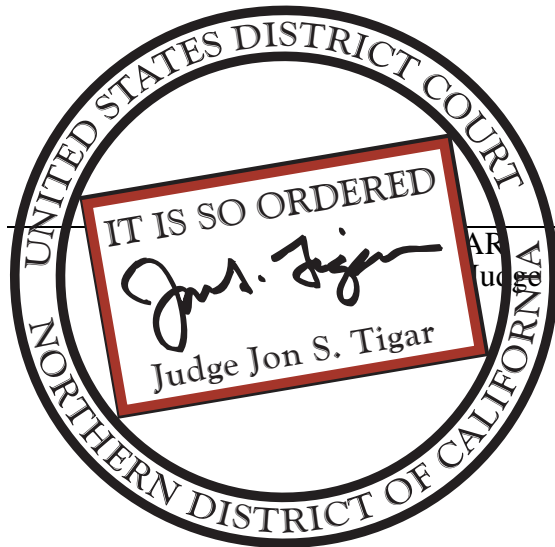
DATED: February 18, 2015

HANSON BRIDGETT LLP

By: \_\_\_\_\_ */s/ Raymond F. Lynch*  
RAYMOND F. LYNCH  
Attorneys for Defendant  
CONTRA COSTA COUNTY

**IT IS SO ORDERED.**

Dated: February 20, 2015



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SIGNATURES UNDER GENERAL ORDER NO. 45

Pursuant to General Order No. 45 of the United States District Court, Northern District of California, I, Raymond F. Lynch—the ECF User whose User ID and Password are used in the filing of this document—hereby attests that the concurrence to the filing of this document has been obtained from each of the other signatories to this document.

/s/ Raymond F. Lynch  
Raymond F. Lynch