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15 Attorneys for Defendant
16 CONTRA COSTA COUNTY

17 **UNITED STATES DISTRICT COURT**
18 **NORTHERN DISTRICT OF CALIFORNIA**

19
20 RETIREE SUPPORT GROUP OF CONTRA
21 COSTA COUNTY,

22 Plaintiff,

23 v.

24 CONTRA COSTA COUNTY,

25 Defendant.

CASE NO. C 12-00944 JST

**STIPULATION EXTENDING CASE
DEADLINES AND ~~PROPOSED~~ ORDER**

Judge: Hon. Hon. Jon S. Tigar

26 WHEREAS, the current Scheduling Order provides the indicated case deadlines (Dkt. 77);

27 WHEREAS, the parties are in the midst of exchanging documents in agreed rolling
28

1 productions, and additional documents remain to be produced;

2 WHEREAS, Plaintiff Retiree Support Group of Contra Costa County (“Plaintiff”) may
3 wish to amend the allegations in its Second Amended Complaint based on documents produced
4 and to be produced, and Defendant Contra Costa County (“Defendant”) will amend its Answer by
5 May 15, 2014 if Plaintiff does not file an amended complaint, or file its response by June 4, 2014
6 if Plaintiff files an amended complaint;

7 WHEREAS, the parties wish to continue to meet and confer on other discovery matters
8 and resolve as many discovery issues as possible without court intervention;

9 WHEREAS, the parties wish to shift case deadlines and the trial date back for ninety (90)
10 days to allow the parties additional time to complete their productions of documents, to permit the
11 filing of amended pleadings, and to more efficiently manage their respective cases;

12 NOW THEREFOR, the parties, by and through their respective counsel of record, hereby
13 stipulate and agree to continue the Case Management Conference set for January 29, 2014 to May
14 28 at 2 p.m. and to the following case deadlines pursuant to Federal Rule of Civil Procedure 16
15 and Civil Local Rule 16-10:

Event	Deadline
Deadline for the parties to complete document production [First RFPs]	3/31/14
Deadline for Plaintiff to amend Complaint and, if Plaintiff does not amend Complaint, for Defendant to file an amended Answer	5/15/14
Deadline for Defendant to file a response if Plaintiff files an amended Complaint	6/4/14
Fact discovery cut-off	11/3/14
Expert disclosures	12/8/14
Expert rebuttal	12/22/14
Expert discovery cut-off	1/8/15
Deadline to file dispositive motions	1/29/15

1	Pretrial conference statement due	4/6/15
2	Pretrial conference	4/16/15 4/17/15 at 2:00 p.m. or such other date available on the Court's schedule
3		
4	Bench trial	5/4/15 at 8:30 a.m. or such other date available on the Court's trial schedule
5		

6 **IT IS SO STIPULATED.**

7 DATED: January 15, 2014

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

8
9
10 By: _____ /s/
NINA WASOW
Attorneys for Plaintiff
11 RETIREE SUPPORT GROUP OF CONTRA
12 COSTA COUNTY

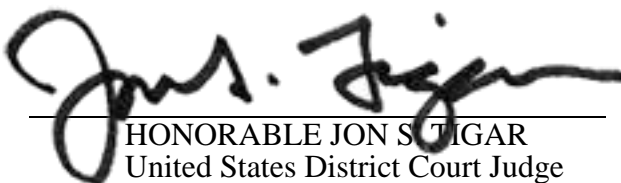
13 DATED: January 15, 2014

HANSON BRIDGETT LLP

14
15 By: _____ /s/
16 RAYMOND F. LYNCH
Attorneys for Defendant
17 CONTRA COSTA COUNTY

18 **IT IS SO ORDERED.**

19 Dated: January 16, 2014

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HONORABLE JON S. TIGAR
United States District Court Judge

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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, Nina Wasow—the ECF User whose User ID and Password are used in the filing of this document—hereby attest that the concurrence to the filing of this document has been obtained from each of the other signatories to this document.

/s/ _____
Nina Wasow