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 16 GREGORY L. SULLIVAN and
 17 KOJI FUJITA

15 UNITED STATES DISTRICT COURT
 16 NORTHERN DISTRICT OF CALIFORNIA

18 GREGORY L. SULLIVAN and
 19 KOJI FUJITA,

Case No.: CV 12-01922 MEJ

20 Plaintiffs,

21 v.

**STIPULATION AND ~~PROPOSED~~ ORDER
 TO CONTINUE DATE FOR DISCLOSURE OF
 EXPERTS AND DISCLOSURE OF
 REBUTTAL EXPERTS**

22 CITY OF SAN RAFAEL, a government
 23 entity; SAN RAFAEL POLICE
 24 DEPARTMENT, a government entity;
 25 RYAN DEMARTA, individually, and in
 26 his capacity as police officer for the CITY
 27 OF SAN RAFAEL; RYAN COGBILL,
 28 individually, and in his capacity as police
 officer for the CITY OF SAN RAFAEL;
 and DOES 1 to 100,

Defendants.

STIPULATION AND [PROPOSED] ORDER TO CONTINUE DATE FOR EXPERT DISCLOSURES AND DISCLOSURE OF REBUTTAL EXPERTS

Sullivan v. City of San Rafael, et al.
 U.S.D.C. Northern District of CA Case No. CV-12-01922 MEJ

1 The parties, by and through their respective counsel, hereby stipulate and request that the
2 presently-scheduled March 29, 2013 Expert Disclosure date be continued to April 23, 2013, and the
3 April 8, 2013 Rebuttal Expert Disclosure date be continued to May 3, 2013 based on the following:

4 The last day to complete fact discovery in this matter is April 23, 2013.

5 Multiple depositions are scheduled during the next several weeks and the parties intend to have
6 their experts review and potentially include information from these depositions in their FRCP Rule 26
7 reports. Moving the expert disclosure dates will accommodate this.

8 Continuing the Expert Disclosure date and the Rebuttal Expert date will not affect any other
9 dates in this case.

10 **SO STIPULATED.**

11 Dated: March 22, 2013

BERTRAND, FOX AND ELLIOT

12 By: /s/ Richard W. Osman
13 Richard W. Osman
14 Attorneys for Defendants

15 Dated: March 22, 2013

LAW OFFICE OF JAMES D. RUSH

16 By: /s/ James D. Rush
17 James D. Rush
18 Attorneys for Plaintiffs

19 Dated: March 22, 2013

GEARINGER LAW GROUP

20 By: /s/ Brian K. Gearinger
21 Brian K. Gearinger
22 Attorneys for Plaintiffs

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1 ~~**[PROPOSED] ORDER**~~

2 Having reviewed the stipulation of counsel herein, IT IS HEREBY ORDERED that the Expert
3 Disclosure date is continued from March 29, 2013 to April 23, 2013 and the Rebuttal Expert date is
4 continued from April 8, 2013 to May 3, 2013.

5 **IT IS SO ORDERED.**

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7 DATED: March 25, 2013



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9 HONORABLE MARIA-ELENA JAMES
10 UNITED STATES MAGISTRATE JUDGE
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