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6 Attorneys for Defendant
DON LAWSON

8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA

11 DAVID DUTCHER,
12 Plaintiff,
13 vs.
14 DON LAWSON, SUSAN DUTCHER,
MARY NOLAN, CHRISTOPHER
15 BUTLER, SHARON TAYLOR,
LATASHA WALLACE, JULIA
16 KOSTINA and DOES ONE to FIFTY,
inclusive,
17 Defendants.

Case No. C12-01981 CRB
**STIPULATION AND ORDER
CONTINUING INITIAL DISCOVERY
AND DISPOSITIVE MOTION
DEADLINES**

19 IT IS HEREBY STIPULATED AND AGREED, by and between the parties to this action,
20 through their respective counsel of record, as follows:

21 WHEREAS this civil rights action is currently pending in the above entitled Court.

22 WHEREAS the parties had previously agreed to an initial discovery schedule and
23 dispositive motion schedule which was confirmed by Your Honor on May 6, 2014, via Order
24 (ECF Doc. 82) (“Order”).

25 WHEREAS the parties have been performing written discovery in this matter since May
26 of 2014.

27 WHEREAS counsel for the Plaintiff have recently informed defense counsel that they are
28 seeking to withdraw as counsel of record in this case, pursuant to California Rule of Professional

1 Conduct 3-700(C) governing the permissive withdrawal of an attorney from the representation of
2 a client. Alternatively, new counsel may substitute in to this case as counsel for Plaintiff.

3 WHEREAS counsel for Defendant DON LAWSON agreed to give Plaintiff some
4 additional time to respond to key written discovery in light of this potential withdrawal by
5 Plaintiff's current counsel, a delay which has set back follow up discovery and depositions in this
6 case, so the current deadlines set in the Order need to be modified to allow defense counsel a full
7 and fair opportunity to conduct written discovery and take the necessary depositions, and to allow
8 time for Plaintiff and/or his new counsel a full and fair opportunity to conduct written discovery
9 and take the necessary depositions.

10 WHEREAS the parties have met and conferred in good faith and have agreed to the
11 following modification to the dates set in the Order (ECF Doc. 82) as follows:

- 12 ▪ Discovery related to certain dispositive motions will be completed by January 23,
13 2015.
- 14 ▪ Initial dispositive motions will be filed no later than March 13, 2015.
- 15 ▪ Hearings on initial dispositive motions will be heard on April 17, 2015.

16 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

17 Dated: September 8, 2014

GEARINGER LAW GROUP

18 THE SCOTT LAW FIRM

19
20 By: /s/ Gearinger, Brian
21 BRIAN GEARINGER / JOHN HOUSTON SCOTT
Attorneys for Plaintiff DAVID DUTCHER

22 Dated: September 8, 2014

ROECA HAAS HAGER LLP

23
24 By: /s/ Haas, Edward
25 EDWARD D. HAAS
26 Attorneys for Defendant MARY NOLAN

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Dated: September 8, 2014

MCNAMARA, NEY, BEATTY, SLATTERY,
BORGES & AMBACHER LLP

By: /s/ Blechman, Noah
JAMES V. FITZGERALD, III
NOAH. G. BLECHMAN
Attorneys for Defendant DON LAWSON

Dated: September 8, 2014

LAW OFFICE OF MATTHEW B. PAVONE

By: /s/ Pavone, Matthew
MATTHEW B. PAVONE
Attorneys for Defendant DON LAWSON

Dated: September 8, 2014

STEELE, GEORGE, SCHOFIELD & RAMOS LLP

By: /s/ Steele, Geoffrey
GEOFFREY WM. STEELE
Attorneys for Defendant CHRISTOPHER BUTLER

Dated: September 8, 2014

LAW OFFICES OF TIM A. PORI

By: /s/ Pori, Tim
TIM A. PORI
Attorneys for Defendant SUSAN GOMES

PURSUANT TO STIPULATION, IT IS SO ORDERED:

Dated: September 15, 2014

By: _____

