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8 UNITED STATES DISTRICT COURT

9 NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO

10 THOMAS E. SMITH,	)	Case No.: C12-3533 LB (MEJ)
	)	
11 Plaintiff,	)	<b>STIPULATION AND <del>PROPOSED</del></b>
	)	<b>ORDER EXTENDING CASE SCHEDULE</b>
12 vs.	)	
	)	
13 STEVEN HARRINGTON, PhD., Individually	)	
and in his official capacity as Superintendent	)	
14 of Schools, for Sonoma County Office of	)	
Education; SHARON E. LIDDELL,	)	
15 Individually and in her official capacity as	)	
Superintendent of Santa Rosa City Schools;	)	
16 GEORGE R. VALENZUELA, Individually	)	
and in his official capacity as Compliance	)	
17 Officer of Santa Rosa City Schools;	)	
STEPHEN MAYER, Individually and in his	)	
18 official capacity as Principal, Proctor Terrace	)	
Elementary School, Santa Rosa City Schools;	)	
19 DEBRA SANDERS, Ed.D, Individually and in	)	
her official capacity as Director Special	)	
20 Services, Santa Rosa City Schools; KIM	)	
CRAVEN, M.S. and M.A., Individually and in	)	
21 his official capacity as Special Services	)	
Offices, Santa Rosa City Schools, School	)	
22 Psychologist; SANTA ROSA CITY SCHOOL	)	
DISTRICT, and DOES 1 through 100,	)	
23	)	
24 Defendants.	)	

25           Whereas discovery that was recently scheduled by both parties to occur in the month of  
 26 April and May had to be postponed due to the unexpected death of Plaintiff’s counsel’s father,  
 27 and his resultant unavailability as he traveled to the East Coast to attend funeral services, and  
 28 whereas the discovery already scheduled will need to occur in the month of May and possibly

1 into early June, the parties hereto, by and through their respective counsel, hereby stipulate and  
2 request that the current case schedule be extended by 30 days.

3 The reason for the requested extension is that the parties have not yet completed the  
4 necessary party and witness depositions. The parties now expect to have those depositions  
5 completed by the end of May or mid-June. Plaintiff has noticed ten (10) depositions, the  
6 maximum number allowed without leave of court, and defense counsel plans to notice at least  
7 three (3) depositions. The undersigned attorneys are working diligently to get these depositions  
8 scheduled in a coordinated and timely manner. Additionally, written discovery served by  
9 Plaintiff has necessitated an extension of time to respond to, which was granted at the request of  
10 defense counsel, and said written discovery will need to be obtained by Plaintiff's counsel in  
11 preparation for the depositions currently scheduled.

12 Therefore, the parties respectfully request that the scheduling order for this case be  
13 extended by 30 days, as set forth in the proposed order below.

14 IT IS SO STIPULATED.

15 Dated: April 16, 2014

THOMAS A. MOORE

16  
17 By: \*/s/ Thomas A. Moore  
18 Attorney for Plaintiff  
19 \*Mr. Moore gave his consent to e-file this  
document

20 Dated: April 16, 2014

HAAPALA, THOMPSON & ABERN, LLP

21  
22 By: /s/ Rebecca S. Widen  
23 Rebecca S. Widen  
Attorneys For Defendants

24 **ORDER**

25 The Court having considered the parties' stipulation, and good cause appearing, IT IS  
26 HEREBY ORDERED that the current case schedule be extended 30 days. The new case  
27 schedule shall be as follows:

28 /

1 <b>EVENT</b>		<b>DEADLINE</b>
2	Fact deposition cutoff	June 20, 2014
3	Designation of Opening Experts	June 27, 2014
4	Designation of Rebuttal Experts	July 11, 2014
5	Expert Discovery Cutoff	July 25, 2014
6	Deadline(s) for Filing Discovery Motions	See Civil Local Rule 37-3
7	Last hearing date for dispositive motions and/or further case management conference	18 September <del>12</del> , 2014, at 9:30 a.m.
8		
9	Meet and confer re pretrial filings November 13, 2014	<del>October 17, 2014</del>
10	Pretrial filings December 4, 2014	<del>October 31, 2014</del>
11	Oppositions, Objections, Exhibits and Deposition Designations due December 18, 2014	<del>November 7, 2014</del>
12		
13	Final Pretrial Conference January 29, 2015 at 1:30 p.m.	<del>November 13, 2014, at 11:00 a.m.</del>
14	Trial February 17, 2015 at 8:30 a.m.	<del>December 15, 2014, at 8:30 a.m.</del>

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16 Dated: April 21, 2014

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U.S. Magistrate Judge Laurel Beeler

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