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10 Attorneys for Plaintiff,
 11 Julieta G. Ludovico

12 UNITED STATES DISTRICT COURT

13 NORTHERN DISTRICT OF CALIFORNIA

14 JULIETA G. LUDOVICO,

Case No. CASE NO. C12-4363 EMC

15 Plaintiff,

**STIPULATION FOR ORDER AND
 [PROPOSED] ORDER TO EXTEND EXPERT
 DISCLOSURE AND EXPERT DISCOVERY
 CASE MANAGEMENT DEADLINES**

16 v.

17 KAISER PERMANENTE aka THE
 18 PERMANENTE MEDICAL GROUP, INC., a
 19 California corporation, and DOES 1-20,
 20 inclusive,

Defendant.

/ TRIAL DATE: October 6, 2014

21 Plaintiff JULIETA LUDOVICO, through her counsel, Sheila A. Reid, Esq., of John F. Prentice
 22 & Associates, PC, and Defendant KAISER PERMANENTE aka THE PERMANENTE MEDICAL
 23 GROUP, INC., through its counsel, Kathleen M. Hurly, Esq., of Kaufman Dolowich Voluck, LLP,
 24 stipulate as follows:

25 1. The parties wish to extend the expert disclosure deadline and the expert discovery
 26 deadline in this matter. The current deadline for expert disclosures is April 29, 2014. The parties make
 27 this stipulation to disclose and depose experts after the last day upon which a motion for summary
 28 judgment can be heard which is no later than July 10, 2014.

STIPULATION AND ORDER TO EXTEND EXPERT DISCLOSURE AND EXPERT DISCOVERY CASE
 MANAGEMENT DEADLINES

1 2. The parties respectfully request that the Court set July 24, 2014, as the expert disclosure
2 deadline; August 7, 2014, as the rebuttal expert disclosure deadline; and August 21, 2014, as the expert
3 discovery cutoff. This proposed schedule will not affect other case management and pretrial deadlines.

4 IT IS SO STIPULATED.

5 DATED: April ³/₂, 2014

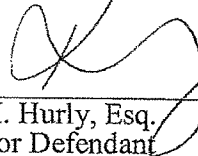
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John F. Prentice, Esq.
Sheila A. Reid, Esq.
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Julieta G. Ludovico

10 3
11 DATED: April ³/₂, 2014

KAUFMAN DOLOWICH VOLUCK, LLP



Kathleen M. Hurly, Esq.
Attorneys for Defendant
Kaiser Permanente aka The Permanente Medical Group

ORDER

19 IT IS SO ORDERED.

