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9 IN THE UNITED STATES DISTRICT COURT  
 10 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
 11 SAN FRANCISCO DIVISION

13 **OSCAR MACHADO AND SANDRA**  
 14 **GARCIA,**  
 15 Plaintiffs,  
 16 v.  
 17 **CALIFORNIA DEPARTMENT OF**  
 18 **CORRECTIONS AND**  
 19 **REHABILITATION, et al.,**  
 20 Defendants.

C 12-6501 JSC (PR)  
**JOINT STIPULATED REQUEST FOR**  
**ORDER CHANGING TIME FOR**  
**EXCHANGING INITIAL DISCLOSURES**  
**AND CASE MANAGEMENT**  
**CONFERENCE SCHEDULED FOR JULY**  
**11, 2013; [~~PROPOSED~~] ORDER**  
 Courtroom: Courtroom F, 15th Floor  
 Judge: Hon. Jacqueline S. Corley  
 Trial Date: TBD  
 Action Filed: December 21, 2012

21 Pursuant to Civil L.R. 6-2, Plaintiff Machado and Garcia (Plaintiffs) and Defendants  
 22 California Department of Corrections and Rehabilitation (CDCR), Cate, and Lewis (Defendants)  
 23 (the "Parties"), by and through their respective counsel of record, hereby stipulate to change the  
 24 time for exchanging initial disclosures set for July 5, 2013 and request that the Case Management  
 25 Conference scheduled for July 11, 2013 before Magistrate Judge Jacqueline S. Corley be  
 26 continued to a reasonable date as decided by the Court for the following reasons:

27 **I. REASONS FOR THE CHANGE OF TIME**

28 Defendants counsel was recently assigned to the case and is still in the process of obtaining

1 records concerning the events pertaining to this case and interviewing clients and witnesses.

2 Plaintiffs' counsel has indicated that he may file an amended complaint.

3 The parties believe that a later date for exchanging initial disclosures and the initial Case  
4 Management Conference serves the interests of judicial and party efficiency.

5 **II. PREVIOUS TIME MODIFICATIONS**

6 The Court granted Plaintiffs' request for an extension of time to serve Defendants with the  
7 summons and complaint. (Order Discharging Show Cause Order and Directing Issuance of  
8 Summons, May 1, 2013, ECF No. 19.)

9 **III. EFFECT THE REQUESTED TIME MODIFICATION WILL HAVE ON SCHEDULE**

10 The Parties respectfully request the Court to reschedule the Case Management Conference  
11 scheduled for July 11, 2013 to a date that is convenient for the Court. And the Parties request that  
12 the Court set the deadline for initial disclosures to a new date in accordance with the new date for  
13 the Case Management Conference. Plaintiff's counsel requests that he be permitted to  
14 telephonically attend the Case Management Conference.

15 Dated: July 2, 2013

Respectfully submitted,

16 /S/WILLIAM L. SCHMIDT

17 WILLIAM LIONEL SCHMIDT

18 William L. Schmidt, Attorney at Law, P.C.

19 *Attorneys for Plaintiffs*

20 *Machado and Garcia*

21 Dated: July 2, 2013

Respectfully submitted,

22 KAMALA D. HARRIS

23 Attorney General of California

24 DAMON G. MCCLAIN

25 Supervising Deputy Attorney General

26 /S/SHARON A. GARSKE

27 SHARON A. GARSKE

28 Deputy Attorney General

*Attorneys for Defendants*

*CDCR, Cate, and Lewis*

1 PURSUANT TO STIPULATION, IT IS ORDERED:

2 1. The date for initial disclosures will be reset in accordance with the new date for the  
3 Case Management Conference.

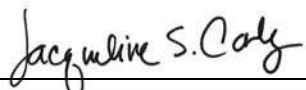
4 2. The Case Management Conference scheduled for July 11, 2013 is vacated.

5 3. The Case Management Conference is rescheduled for August 22, 2013 at 1:30 p.m.

6 4. Plaintiff's counsel will be permitted to telephonically attend the Case Management  
7 Conference. via Court Call (1-888-882-6878)

8 5. The new date for exchange of initial disclosures is August 9, 2013.

9  
10 Dated: July 3, 2013, 2013

  
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United States District Magistrate Judge  
Jacqueline Scott Corley

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