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10 Plaintiff, *Pro Se*

11 UNITED STATES DISTRICT COURT  
 12 NORTHERN DISTRICT OF CALIFORNIA  
 13 SAN FRANCISCO DIVISION  
 14

15 WELBORN FREEMAN,

16 Plaintiff,

17 v.

18 UNITED STATES OF AMERICA

19 Defendant.

) CASE NO. 13-02421 VC

)  
)  
) JOINT STIPULATED REQUEST FOR ORDER  
) CHANGING TIME AND ~~PROPOSED~~ ORDER

1 Defendant United States of America (“Defendant”), by and through its undersigned counsel and  
2 Plaintiff Welborn Freeman, Pro Se (“Plaintiff”), hereby stipulate that the current case schedule should be  
3 vacated pending assignment of a pro bono attorney to Plaintiff pursuant to Civil Local Rule 6-1(a) of the  
4 Northern District of California, as follows:

5 1. On January 29, 2014, this Court entered a Case Management Schedule setting the  
6 following dates. Dkt. No. 80.

7 Fact discovery cut off: October 31, 2014

8 Expert disclosure deadline: November 14, 2014

9 Rebuttal expert disclosure: December 19, 2014

10 Expert discovery cut-off: January 20, 2015

11 Dispositive Motion Hearing: March 19, 2015

12 Pretrial Conference: May 29, 2015

13 Trial Date: June 29, 2015

14 2. On July 29, 2014, this Court entered an Order Referring Plaintiff to the Federal Pro Bono  
15 Project in response to his request for appointment of counsel, and further staying this matter until four  
16 weeks from the date an attorney is appointed to represent Plaintiff. Dkt. No 98.

17 3. Given the approach of the close of fact discovery and the fact that an attorney has not yet  
18 been appointed to Plaintiff, the parties hereby stipulate and respectfully request that the Court vacate the  
19 current Case Management Schedule and reset all deadlines in this matter once counsel has been  
20 appointed to Plaintiff. The parties respectfully suggest that the Court set a deadline for submission of a  
21 Case Management Statement for a date after the appointment of counsel to allow for a suggested  
22 schedule subject to the approval of the Court or to request a Case Management Conference if no such  
23 schedule can be agreed upon. Because the stay in this matter is scheduled to be lifted automatically four  
24 weeks from the date an attorney is appointed to represent Freeman in this action, the parties also  
25 respectfully suggest that the Court order submission of the Case Management Statement 30 days after  
26 the stay is automatically lifted.

27 IT IS SO STIPULATED.

28 ///

1 DATED: October 3, 2014

By: Welborn H Freeman, Jr.  
WELBORN FREEMAN  
Plaintiff, Pro Se

2  
3  
4 DATED: October 2, 2014

MELINDA HAAG  
United States Attorney


5  
6 By: /s/ Rebecca A. Falk  
REBECCA A. FALK  
Assistant United States Attorney  
Attorneys for Federal Defendant

7  
8  
9 ~~PROPOSED~~ ORDER

10 Pursuant to the stipulation by the parties, and good cause having been shown, it is hereby ordered  
11 that the Case Management Schedule previously entered in this matter (Dkt. No. 80) is vacated. The  
12 parties are ordered to submit a Case Management Statement within 30 days after the stay in this matter  
13 is lifted pursuant to this Court's July 29, 2014 Order (Dkt. No. 98).

14  
15 **IT IS SO ORDERED.**

16  
17 DATED: October 6, 2014

18   
HONORABLE VINCE CHHABRIA  
UNITED STATES DISTRICT COURT JUDGE