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UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA

Sanjay Bhatnagar,

Plaintiff,

vs.

The United States of America,

Defendant.

Case No. 14-cv-00327-MEJ

**STIPULATION AND ~~(PROPOSED)~~ ORDER  
 EXTENDING DISCOVERY AND DISPOSITIVE  
 MOTIONS DEADLINES**

1           Whereas, on December 15, 2015, after consulting with counsel for both parties,  
2 Magistrate Judge Beeler continued the date for the settlement conference in this action to April  
3 26, 2016 (Dkt. 70);

4           Whereas, the new settlement conference date falls just before the deadline for disclosure  
5 of expert witnesses, currently set for April 29, 2016 (Dkt. 65);

6           Whereas, in compliance with Judge Beeler's order, counsel for the parties have met and  
7 conferred regarding a plan for discovery to occur before the settlement conference, as described  
8 in the declaration of Alex Reese filed with this stipulation in compliance with Civil L.R. 6-2;

9           Whereas, the parties have agreed that extending certain discovery and dispositive motion  
10 deadlines would better facilitate discovery and allow for meaningful settlement discussion at the  
11 April 26 conference;

12           Whereas, extending the discovery and dispositive motion deadlines would not impact the  
13 December 12, 2016 trial date or any pretrial deadlines in this case;

14           Therefore, the parties hereby stipulate and agree that the following deadlines are extended  
15 as follows:

- 16           • Disclosure of Expert Witnesses: Extended from April 29, 2016 to May 27, 2016;
  - 17           • Disclosure of Rebuttal Expert Witnesses: Extended from May 9, 2016 to June 10,  
18 2016;
  - 19           • Close of Discovery: Extended from May 24, 2016 to June 24, 2016;
  - 20           • Deadline to File Dispositive Motions: Extended from June 23, 2016 to July 22,  
21 2016;
  - 22           • Hearing on Dispositive Motions: Extended from July 28, 2016 at 10:00 a.m. to  
23 September 1, 2016 at 10:00 a.m. (or any other date that is convenient for the  
24 Court);
  - 25           • All other dates remain unchanged.
- 26  
27  
28

1 January 20, 2016

FARELLA BRAUN + MARTEL LLP

2  
3 By: /s/ Alex Reese  
4 Alex Reese

5 Attorneys for Plaintiff Sanjay Bhatnagar

6 January 20, 2016

BRIAN J. STRETCH  
Acting United States Attorney

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9 By: /s/ Robin M. Wall  
10 Robin M. Wall

Assistant United States Attorney

11 Attorneys for Defendant United States of  
12 America

13  
14 **FILER'S ATTESTATION**

15 In compliance with Civil L.R. Rule 5-1, I hereby attest that all parties have concurred in  
16 the filing of this Stipulation and (Proposed) Order Extending Discovery and Dispositive Motion  
17 Deadlines.

18  
19  
20 January 20, 2016

/s/ Alex Reese

21 Alex Reese

22  
23  
24 **~~(PROPOSED)~~ ORDER**

25  
26 In accordance with a stipulation between the parties, IT IS ORDERED that the deadlines  
27 for discovery and dispositive motions are hereby extended as follows:

- Disclosure of Expert Witnesses: Extended from April 29, 2016 to May 27, 2016;
- Disclosure of Rebuttal Expert Witnesses: Extended from May 9, 2016 to June 10, 2016;
- Close of Discovery: Extended from May 24, 2016 to June 24, 2016;
- Deadline to File Dispositive Motions: Extended from June 23, 2016 to July 22, 2016;
- Hearing on Dispositive Motions: Extended from July 28, 2016 at 10:00 a.m. to September 1, 2016 at 10:00 a.m. (or any other date that is convenient for the Court);
- All other dates remain unchanged.

Date: January 20, 2015



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Honorable Maria-Elena James  
United States Magistrate Judge