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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

JEFFREY B. NORSWORTHY (a/k/a  
MICHELLE-LAEL B. NORSWORTHY),

Plaintiff,

vs.

JEFFREY BEARD; A. NEWTON; A.  
ADAMS; LORI ZAMORA; RAYMOND  
J. COFFIN; MARION SPEARMAN;  
DAVID VAN LEER; JARED LOZANO;  
and DOES 1-30,

Defendants.

Case No. 3:14-cv-00695-JST

**STIPULATION AND [PROPOSED]  
ORDER REVISING SCHEDULE FOR  
PLAINTIFF'S MOTION FOR  
PRELIMINARY INJUNCTION**

Plaintiff and Defendants (collectively, "Parties") in the above-captioned case hereby stipulate as follows:

WHEREAS, at the Initial Case Management Conference on October 15, 2014, the Court requested that the Parties submit a proposed schedule for Plaintiff's forthcoming Motion for Preliminary Injunction (Dkt. No. 28);

WHEREAS, on November 6, 2014, the Court entered the stipulated Scheduling Order Regarding Plaintiff's Motion for Preliminary Injunction, which, inter alia, set January 5, 2015 as the close of fact discovery and set March 4, 2015 as the date for the hearing on Plaintiff's Motion for Preliminary Injunction;

WHEREAS, in the interim, Parties have diligently and in good faith engaged in discovery in preparation for briefing on the Motion for Preliminary Injunction, including the production of thousands of documents and the taking of seven depositions;

STIPULATION AND [PROPOSED] REVISED  
SCHEDULING ORDER

1 WHEREAS, Defendants have informed Plaintiff that they will not be able to complete the  
2 production of documents responsive to the outstanding requests for production until the end of  
3 January at the earliest;

4 WHEREAS, Plaintiff diligently is seeking to schedule the deposition of Plaintiff's treating  
5 psychologist during part of the relevant period, Dr. Reese, who has retired from CDCR and is  
6 represented by separate counsel, but will not be able to complete that deposition by the current  
7 deadline for fact discovery related to the motion for preliminary injunction;

8 WHEREAS, in light of these circumstances, Parties would benefit from a brief extension  
9 of the current schedule to allow Parties to complete discovery prior to briefing the Motion for  
10 Preliminary Injunction;

11 NOW, THEREFORE, IT IS HEREBY STIPULATED between the Parties, and subject to  
12 the concurrence of the Court, that the schedule for Plaintiff's forthcoming Motion for Preliminary  
13 Injunction will be revised as follows:

<b>Event</b>	<b>Originally Set Date</b>	<b>Revised Date</b>
Close of Fact Discovery as It Relates to Preliminary Injunction Motion	January 5, 2015	February 2, 2015
Disclosure of Plaintiff's Expert Report(s)	January 5, 2015	February 2, 2015
Disclosure of Defendants' Rebuttal Expert Report(s)	January 21, 2015	February 18, 2015
Disclosure of Plaintiff's Reply Expert Report(s)	January 29, 2015	February 26, 2015
Plaintiff's Motion for Preliminary Injunction	January 29, 2015	February 26, 2015

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<b>Event</b>	<b>Originally Set Date</b>	<b>Revised Date</b>
Defendants' Opposition to Motion for Preliminary Injunction	February 12, 2015	March 12, 2015
Plaintiff's Reply in Support of Motion for Preliminary Injunction	February 19, 2015	March 19, 2015
Hearing on Motion for Preliminary Injunction	March 4, 2015 at 2:00 pm in Courtroom 9 <sup>1</sup>	April 1, 2015 <del>or such other date set by the Court.</del>

**IT IS SO STIPULATED.**

Dated: December 31, 2014

MORGAN, LEWIS & BOCKIUS LLP

By           /s/ - Herman J. Hoying            
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Attorneys for Plaintiff

<sup>1</sup> The parties shall meet and confer regarding the need for an evidentiary hearing and shall inform the Court should they believe that an evidentiary hearing will be beneficial in deciding Plaintiff's Motion for Preliminary Injunction.

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Dated: December 31, 2014

KAMALA D. HARRIS  
Attorney General of California  
WILLIAM C. KWONG  
Supervising Deputy Attorney General

By         /s/ Edward R. Fluet          
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Attorneys for Defendants M. Spearman,  
R. Coffin, J. Lozano, A. Adams, and L.  
Zamora

**IT IS SO ORDERED.**

Dated: January 2, 2015

