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Attorneys for Plaintiffs

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

12 BELINDA GOINS, individually and as co-
 13 successor-in-interest to DAVID GOINS; DAVID
 14 GOINS, JR., individually and as co-successor-in-
 15 interest to DAVID GOINS; MARTIN GOINS,
 16 individually and as co-successor-in-interest to
 17 DAVID GOINS;

Case No. C 14-03806 VC

**STIPULATION AND ~~(PROPOSED)~~ ORDER
 MODIFYING CASE MANAGEMENT
 SCHEDULE**

18 Plaintiffs,

19 vs.

20 COUNTY OF ALAMEDA, a municipal
 21 corporation; GREGORY J. AHERN, in his
 22 capacity as Sheriff for the COUNTY OF
 23 ALAMEDA; SIERRY WILHELM, individually
 24 and in his official capacity as a sergeant for the
 25 COUNTY OF ALAMEDA; ROBERT
 26 GRIFFITH, individually and in his official
 27 capacity as a deputy sheriff for the COUNTY OF
 28 ALAMEDA; MARIO FELIX, individually and
 in his official capacity as a lieutenant for the
 COUNTY OF ALAMEDA; and DOES 4-100,
 inclusive,

Defendants.

/

STIPULATION

WHEREAS, the parties have proceeded with conducting discovery in the instant action;

WHEREAS, the depositions of Plaintiffs and Defendants have been noticed, but have been delayed by conflicts in plaintiffs and defendants calendars;

WHEREAS, Expert Witness Designations were due in this matter to be exchanged by June 26, 2015;

WHEREAS, counsel for the parties have agreed to postpone the exchange of expert witness disclosures until after the completion of a settlement conference;

WHEREAS, the retention of retained expert witnesses in this matter will be one of the most significant costs each party incurs in this action, and will include retained use of force, reconstruction/human factors, and medical experts;

WHEREAS, the settlement conference in this case was originally scheduled to occur April 8, 2015, and was then re-set by Magistrate Judge Beeler to June 26, 2015 (Docket No. 25);

WHEREAS, the settlement conference in this case was then postponed to July 17, 2015, due to another settlement conference in a different matter (Jimenez, et al. v. County of Alameda, et al. Northern Dist. Case No. 13-14620 CRB, in which the same undersigned counsel represents Plaintiffs and Defendants, was ordered by Judge Breyer to occur in place of the settlement conference in the instant action, also before Magistrate Judge Beeler (Docket No. 27);

WHEREFORE, the parties respectfully request that the Court's scheduling order in this action (Docket No. 19) be modified to allow the parties to attempt to resolve this action prior to incurring the significant costs of necessary expert witnesses, which may be detrimental to settlement discussions by:

1. Extending the date for exchange of Opening Expert Witnesses Designations and Reports to September 1, 2015, to allow for retention of experts, and preparation, and completion of opening expert witness reports;

