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 9 UNITED STATES DISTRICT COURT
 10 NORTHERN DISTRICT OF CALIFORNIA
 11 SAN FRANCISCO DIVISION
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13 LUCILLE WINSTON and L.N.,) Case No. 14-cv-05417 MEJ (SK)
)
 14 Plaintiffs,) ~~STIPULATION AND [PROPOSED]~~
) **ORDER TO EXTEND DISCOVERY**
 15 v.) **AND DISPOSITIVE MOTIONS**
) **DEADLINES**
 16 UNITED STATES OF AMERICA, et al.,)
)
 17 Defendants.)
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19 Subject to the approval of the Court, plaintiffs Lucille Winston and L.N.,¹ federal defendant
 20 United States of America, and defendants Keenan Lee Grawe and Karen Himes Grawe, (collectively,
 21 “the parties”) by and through their respective counsel, hereby stipulate to extend the deadlines for fact
 22 and expert discovery, and the deadlines for dispositive motions. The parties, by and through their
 23 counsel of record, hereby stipulate and agree as follows:

24 1. Pursuant to the Court’s February 11, 2016 Case Management Order, the discovery and
 25 dispositive motions deadlines are currently as follows:

- 26 • Disclosure of Expert Witnesses: August 12, 2016

28 ¹ Pursuant to Federal Rule of Civil Procedure 5.2(a), only plaintiff’s initials are provided.

- Disclosure of Rebuttal Expert Witnesses: August 22, 2016
- Close of Discovery: September 6, 2016
- Deadline to File Dispositive Motions: October 6, 2016

The initial pretrial conference is set for February 16, 2017; the final pretrial conference is set for March 16, 2017; and the trial in this case is set to begin on March 27, 2017.

2. The parties seek to extend the deadline for expert witnesses to September 19, 2016, the deadline for disclosure of rebuttal expert witnesses to October 17, 2016, the close of discovery to November 18, 2016, and the deadline to file dispositive motions to October 27, 2016. The extension is needed because the parties are currently in the process of scheduling mutually convenient dates for the depositions of the plaintiffs in this action, and the parties anticipate that additional time after those depositions will be needed to allow time for further fact and expert discovery.

3. For the reasons discussed above, subject to the Court's approval, the parties, through their undersigned counsel, hereby agree and stipulate to extend the expert disclosure deadline from August 12, 2016 to September 19, 2016; the rebuttal expert disclosure deadline from August 22, 2016 to October 17, 2016; the close of expert discovery from September 6, 2016 to November 18, 2016; and the deadline to file dispositive motions from October 6, 2016 to October 27, 2016. All other case management dates, including the trial date, would remain the same.

IT IS SO STIPULATED.

Dated: July 13, 2016

Respectfully submitted,
BRIAN J. STRETCH
United States Attorney
/s/ Jennifer S Wang
JENNIFER S WANG*
Assistant United States Attorney

Dated: July 13, 2016

LAW OFFICES OF BRIAN L. LARSEN
/s/ Brian L. Larsen
BRIAN L. LARSEN
Attorneys for Plaintiffs

Dated: July 11, 2016

VOGL MEREDITH & BURKE LLP
/s/ Michael Burke
MICHAEL BURKE
Attorneys for Defendants Keenan Lee
Grawe and Karen Himes Grawe

1 **In compliance with Civil Local Rule 5-1(i), the filer of this document attests that plaintiffs and*
2 *defendants Keenan and Karen Grawe have concurred in the filing of this document.*

3 ~~PROPOSED~~ ORDER

4 Pursuant to the parties' stipulation and good cause having been shown, it is hereby ordered that:

- 5 1. The deadline for disclosure of expert witnesses is September 19, 2016
6 2. The deadline for disclosure of rebuttal expert witnesses is October 17, 2016
7 3. The close of discovery will be November 18, 2016
8 4. The deadline to file dispositive motions will be October 27, 2016, and the last day to hear
9 dispositive motions will be December 1, 2016.

10 IT IS SO ORDERED.

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13 Dated: July 14, 2016



14 HON. MARIA-ELENA JAMES
15 UNITED STATES MAGISTRATE JUDGE