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18 UNITED STATES DISTRICT COURT
 19 NORTHERN DISTRICT OF CALIFORNIA
 20 OAKLAND DIVISION

21 THOMAS RAY WOODSON,
 22 Plaintiff,

23 v.

24 J. RODRIGUEZ, *et al.*,
 25 Defendants.

Case No. 4:07-CV-04925-CW

**STIPULATION AND ~~PROPOSED~~
 ORDER RESETTING CASE
 MANAGEMENT DATES**

Judge: The Honorable Claudia Wilken

Complaint Filed: September 21, 2007

Trial Date: June 27, 2011

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 STIPULATION AND [PROPOSED] ORDER RESETTING CASE MANAGEMENT DATES
 CASE NO. 4:07-CV-04925-CW
 sf-2874157

1 Pursuant to Northern District Local Rules 7-12 and 16-2, counsel for Plaintiff Thomas R.
2 Woodson and counsel for Defendants J. Rodriguez, E. Camarena, J. Parra, D. Vega, and Sergeant
3 Kircher hereby submit this Stipulation and Proposed Order regarding case management dates and
4 discovery proceedings.

5 WHEREAS, counsel for Mr. Woodson, Catharine B. Baker, has to take a leave of absence
6 from her work with Morrison & Foerster LLP from August 1, 2010 through approximately
7 November 1, 2010, for personal reasons;

8 WHEREAS, the parties agree that the interests of the parties and judicial economy would
9 be best served by continuing the case management dates other than the trial and final pre-trial
10 conference dates, as set forth below;

11 IT IS HEREBY STIPULATED AND AGREED by the parties, by and through their
12 respective counsel, that:

- 13 1. The case management dates be reset as follows:

Event	Current Deadline	Stipulated Deadline
Deadline to add parties or claims	9/1/10	11/19/10
ADR session to be held by	10/1/10 (settlement conference currently set for 9/3/10)	12/17/10
Fact discovery cut-off	10/1/10	12/17/10
Expert disclosures (names, reports)	10/29/10	1/14/11
Expert rebuttal reports	11/19/10	2/1/11
Expert discovery cut-off	12/17/10	2/18/11
MSJ Hearing, CMC	2/3/11 at 2:00 p.m.	4/7/11 at 2:00 p.m., or such date thereafter as the Court designates.
Pretrial Conference	6/14/11 at 2:00 p.m.	same
Trial	6/27/11	same

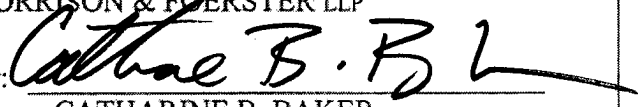
1 2. Unless the parties agree otherwise in writing, no written discovery directed to any
2 party or non-party propounded after the date of this stipulation shall be due before November 1,
3 2010. Depositions shall not be taken until after November 1, 2010.

4 3. Unless the parties agree otherwise in writing, any discovery propounded in this
5 action by either party as of the date of this stipulation is not to be limited by this stipulation and
6 can be the subject of any further negotiations and agreements between the parties and any
7 necessary motions, including motions to compel.

8 Dated: July 23, 2010

Respectfully Submitted,

MATTHEW I. KREEGER
CATHARINE B. BAKER
JANELLE SAHOURIA
MORRISON & FOERSTER LLP

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11 By: 
12 CATHARINE B. BAKER

13 Attorneys for Plaintiff
14 THOMAS RAY WOODSON

15
16 Dated: July 23, 2010

JOSE A. ZELIDON-ZEPEDA
NEAH HUYNH
CALIFORNIA ATTORNEY GENERAL'S
OFFICE

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18
19 By: 
20 JOSE A. ZELIDON-ZEPEDA

21 Attorneys for Defendants
22 J. RODRIGUEZ, E. CAMARENA, J.
23 PARRA, D. VEGA, AND SERGEANT
24 KIRCHER

25 **PURSUANT TO THE PARTIES' STIPULATION, IT IS SO ORDERED.**

26 Dated: 7/26/2010

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HONORABLE CLAUDIA WILKEN
United States District Court Judge