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12 NICHOLAS BART ELLIS

13 UNITED STATES DISTRICT COURT
14 NORTHERN DISTRICT OF CALIFORNIA
15 OAKLAND DIVISION

16 NICHOLAS BART ELLIS,
17 Plaintiff,

18 v.

19 A. NAVARRO, et al.
20 Defendants.

Case No. C 07-5126 SBA (DMR)

**STIPULATION AND PROPOSED
ORDER REGARDING DISCOVERY**

21 RECITALS

22 WHEREAS the parties met and conferred regarding outstanding discovery disputes at
23 issue in Docket 59 during a conference on November 29, 2011 before Hon. Laurel Beeler,
24 and with the participation of Judge Beeler.

25 WHEREAS Pelican Bay State Prison's Litigation Coordinator, William Barnts, and
26 Jason S.Y. Gatchalian, Staff Counsel for the California Department of Corrections and
27 Rehabilitation, participated in the conference.

28 WHEREAS the parties have resolved their disputes concerning deposition scheduling
and protocol.

1 Dated: November 29, 2011

PILLSBURY WINTHROP SHAW PITTMAN LLP
THOMAS V. LORAN III
MARC H. AXELBAUM

2
3 /s Marc H. Axelbaum

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11 SERGEANT A. NAVARRO
12 CORRECTIONAL OFFICER F. JUAREZ
13 CORRECTIONAL OFFICER B. GARDNER

14 DECLARATION PURSUANT TO GENERAL ORDER 45, sec. X.B

15 I, Marc H. Axelbaum, hereby declare pursuant to General Order 45, sec. X.B., that I
16 have obtained the concurrence in the filing of this document from the signatory listed below.

17 I declare under penalty of perjury that the foregoing is true and correct.

18 Executed on November 29, 2011, at Oakland, California.

19
20 /s Marc H. Axelbaum


21 Marc H. Axelbaum
Attorneys for Plaintiff NICHOLAS BART ELLIS

22 ORDER

23 Pursuant to the parties' stipulation, the court adopts the above discovery procedures
24 and dates, which do not modify any of the filing or hearing dates before the district court.

25 The court vacates the discovery hearing set for November 30, 2011, at 11 a.m.

26 IT IS SO ORDERED.
27 DATED: Nov. 30, 2011

28 

DONNA M. RYU
United States Magistrate Judge