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11 Attorneys for Plaintiff Allen Faron

12 UNITED STATES DISTRICT COURT
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 14 NORTHERN DISTRICT OF CALIFORNIA
 15
 16 OAKLAND DIVISION

17 ALLEN FARON,
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 19 Plaintiff,
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 21 v.
 22 ST. JOSEPH HOSPITAL; ST. JOSEPH
 23 HEALTH SYSTEM; KEVIN
 24 MOLANDER, M.D.; JOHN KELSEY,
 25 M.D.; RONALD CORDOVA, M.D.; and
 26 UNITED STATES OF AMERICA;
 27 inclusive,
 28 Defendants.

CASE NO. CGC-07-5602 SBA (related to C 06-06662 SBA)

**STIPULATION AND [PROPOSED]
 ORDER TO EXTEND DEADLINE TO
 COMPLETE FACTUAL AND EXPERT
 DISCOVERY**

21 The parties engaged in a fruitful mediation on July 22, 2008. Plaintiff submitted a global
 22 settlement demand, and the five co-defendants are in the process of coordinating their response.
 23 The parties are scheduled for a mandatory settlement conference with Magistrate Judge Maria-
 24 Elena James on September 16, 2008. In light of the pending settlement negotiations, the parties
 25 by and through their attorneys, request that the deadline to complete factual discovery in this case
 26 be extended from August 22, 2008 to September 26, 2008 and that the deadline for expert
 27 disclosures be extended from September 8, 2008 to October 10, 2008. Expert discovery will be
 28 completed no later than November 21, 2008 with rebuttal experts disclosed no later than October

1 24, 2008. The trial and pre-trial dates will remain the same.

2 The parties believe that the brief extension will facilitate settlement.

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Dated: July 30, 2008

Respectfully submitted,

By: _____ /s/
Kent Klaudt

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Dated: July 30, 2008

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Dated: July 30, 2008

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Dated: July 30, 2008

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and John Kelsey*

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ORDER

The Court, having considered the stipulation of the parties, hereby extends the deadline to complete factual discovery to September 26, 2008, expert disclosures to October 10, 2008, rebuttal expert disclosures to October 24, 2008, and expert discovery to November 21, 2008.

All other dates will remain the same.

It is so ordered.



SAUNDRA BROWN ARMSTRONG
U.S. DISTRICT JUDGE