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CITY OF ANTIOCH

19 UNITED STATES DISTRICT COURT
20 NORTHERN DISTRICT OF CALIFORNIA

21 SANTEYA DANYELL WILLIAMS,
22 MARY RUTH SCOTT, KAREN
23 LATREECE COLEMAN, PRISCILLA
BUNTON, and ALYCE DENISE PAYNE,
24 on behalf of themselves and all others
similarly situated,

25 Plaintiffs,
26 v.
27 CITY OF ANTIOCH,
28 Defendant.

No. C-08-2301 SBA (EDL)
**STIPULATION AND ORDER
MODIFYING DISCOVERY DATES**

Dockets.Justia.com

1 The parties hereby stipulate to a modest modification of the class certification
2 discovery deadlines in this case. This request does not change the deadline for filing and hearing
3 of Plaintiffs' motion for class certification.

4 Discovery commenced in this class action after the Case Management Conference
5 held on October 2, 2008. Since that time the parties have exchanged initial disclosures and
6 initial written discovery, produced thousands of pages of documents and electronic data,
7 negotiated document preservation and protective orders. In addition, Plaintiffs have taken a
8 deposition pursuant to Fed. R. Civil Pro 30(b)(6), served subpoenas, obtained documents from
9 the Housing Authority of Contra Costa County and have filed and won a motion to compel
10 further production from it.

11 The parties have cooperated in discovery, but it has become apparent that, due to
12 the substantial amount of electronic data and emails involved, and the necessity of pre-disclosure
13 document review by Defendant, the current discovery cut off of May 1, 2009, does not allow
14 sufficient time for the parties to prepare for a settlement conference, or to complete class
15 certification discovery. The parties have agreed to the following modification of the discovery
16 dates, which is contingent upon Defendant completing production of documents and
17 supplementing its response to Plaintiffs' First Request for Production of Documents and
18 providing a privilege log by March 20, 2009. Since class certification dates are unchanged, this
19 modification will not delay this action:

	Current	Proposed	
21			
22	Discovery Cut Off	May 1, 2009	June 15, 2009
23	Plaintiff Expert Report	May 15, 2009	June 15, 2009
24	Defendant Expert	June 15, 2009	August 3, 2009
25	Rebuttal Expert	July 15, 2009	September 1, 2009

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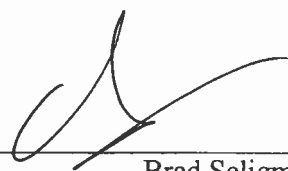
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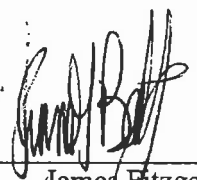
	Current	Proposed
3 Class Cert. Motion	September 15, 2009	Unchanged
4 Class Cert. Opposition	October 6, 2009	Unchanged
5 Class Cert. Reply	October 13, 2009 ¹	

6 The settlement conference date with Magistrate Judge Larson has been changed
7 from March 24, 2009 to June 12, 2009.

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9 DATED: March 9, 2009


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12 By: 
13 Brad Seligman
14 Attorneys for Plaintiffs and the Proposed Class

15 DATED: March 9, 2009

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18 By: 
19 James Fitzgerald Thomas G. Booth
20 Attorneys for Defendant

21 IT IS SO ORDERED.

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23 DATED: March 10, 2009

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Hon. Elizabeth D. Laporte
Judge Elizabeth D. Laporte

¹ At the Case Management Conference, the Court ordered the reply by October 13; the Case Management Conference Minutes erroneously transposed this date to October 31, 2009.