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 7
 8 IN THE UNITED STATES DISTRICT COURT
 9 FOR THE NORTHERN DISTRICT OF CALIFORNIA

10
 11 JOSEPH HALBLEIB,

No. C 08-2657 CW

12 Plaintiff,

~~PROPOSED~~ ORDER AND
 STIPULATION TO EXTEND DEADLINE
 FOR COMPLETION OF FACT
 DISCOVERY AND MEDIATION

13 v.

14
 15 CHP OFFICER DALE COPPAGE; DOES
 1-50, inclusive,

16 Defendants.
 17 _____/

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 19 Plaintiff Joseph Halbleib and Defendant Dale Coppage, by and through their respective
 20 counsel, hereby stipulate as follows:

21 1. The parties have been ordered to complete Fact Discovery by March 13, 2009.

22 2. Plaintiff has requested extensive discovery from Defendant by way of
 23 interrogatories and requests for production of documents. Defendant originally made numerous
 24 objections to Plaintiff's requests. After several conferences, Plaintiff and Defendant have
 25

1 agreed that the majority of items requested by Plaintiff would be turned over pursuant to a
2 protective order. Defendant is in the process of compiling and producing these items.

3 3. Plaintiff can not take Defendant's deposition until after he has had the
4 opportunity to review the discovery which has yet to be produced by Defendant.
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6 4. Counsel for Plaintiff will be on vacation and out of the country from February 26
7 through March 10, 2009.

8 5. In order to provide additional time to review forthcoming discovery, conduct
9 additional investigation as needed, and depose Defendant, the Plaintiff requests, and the parties
10 stipulate, that the deadline for completion of fact discovery be extended to April 15, 2009.
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12 6. The parties agree that a mediation should not occur until after Plaintiff has had
13 the opportunity to depose Defendant. For this reason, the parties stipulate that the mediation
14 deadline be extended to April 30, 2009.
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16 7. This is the first time the parties have requested an extension of deadline for
17 completion of fact discovery and the second time the parties have requested an extension of the
18 mediation deadline.

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