

1 Camellia Baray, State Bar No. 179219  
 2 BONJOUR, THORMAN, BARAY & BILLINGSLEY  
 24301 Southland Dr., Ste 312  
 Hayward, Ca. 94545  
 3 Telephone: (510) 785-8400  
 Facsimile: (510) 670-0955  
 4 [camellia@btbandb.com](mailto:camellia@btbandb.com)

5 Attorneys for Plaintiff Joseph Halbleib

6  
 7 IN THE UNITED STATES DISTRICT COURT  
 8 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
 9

10  
 11 JOSEPH HALBLEIB,

No. C 08-2657 CW

12 Plaintiff,

~~PROPOSED~~ ORDER AND  
 STIPULATION TO EXTEND DEADLINE  
 FOR DISCLOSURE OF IDENTITIES OF  
 EXPERT WITNESSES AND  
 COMPLETION OF EXPERT DISCOVERY

13 v.

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

16 Defendants.  
 17 \_\_\_\_\_ /

18  
 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 disclosure of identities and reports of  
 22 expert witnesses by June 15, 2009.  
 23  
 24 2. The expert discovery cut-off date is set for July 31, 2009.  
 25  
 26 3. The parties are engaged in ongoing negotiations in an attempt to settle this case  
 27 before trial. In order to afford sufficient time to discuss settlement prior to incurring additional  
 28 expense for expert witnesses, the parties stipulate that the deadline for identification and reports

1 of expert witnesses be extended to July 8, 2009, and the deadline for completion of expert  
2 discovery be extended to August 14, 2009.

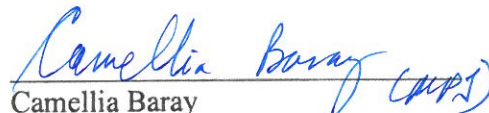
3 4. This is the second time the parties have requested an extension of the deadlines  
4 with respect to expert discovery.

5 5. Trial is scheduled to begin on September 14, 2009. An extension of time to  
6 complete expert discovery should not interfere with the progression of this case as currently  
7 scheduled.  
8

9  
10 IT IS SO STIPULATED.  
11

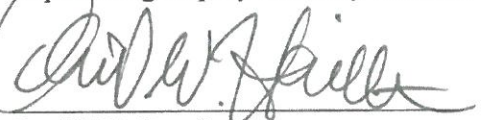
12  
13 Dated: June 15, 2009

Bonjour, Thorman, Baray & Billingsley

14  
15   
16 Camellia Baray  
17 Attorney for Plaintiff Joseph Halbleib

18 Dated: June \_\_\_\_, 2009

19 Edmund G. Brown Jr.  
20 Attorney General of the State of California  
21 Tyler B. Pon  
22 Supervising Deputy Attorney General

23   
24 David W. Hamilton  
25 Deputy Attorney General  
26 Attorneys for Defendant Dale Coppage  
27  
28

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: 6/18/09



\_\_\_\_\_  
THE HON. CLAUDIA WILKEN  
UNITED STATES DISTRICT COURT  
JUDGE