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9 Attorneys for Plaintiff

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 OAKLAND DIVISION

13 MONICA HOLMES,

14 Plaintiff,

15 vs.

16 UNITED STATES OF AMERICA,

17 Defendant.

) CASE NO. 08-05619 PIH
) ORDER DENYING REQUEST
) **STIPULATION TO EXTEND DISCOVERY**
) **DEADLINES; [PROPOSED] ORDER**

- 18 1. Pursuant to the Court's April 13, 2009 Case Management and Pretrial Order, the deadlines
19 for expert and fact discovery, and dispositive motions are as follows:

20 Expert Disclosure: December 2, 2009

21 Rebuttal Expert Disclosure: December 23, 2009

22 Expert Discovery Cut-off: January 27, 2010

23 Non-Expert Discovery Cut-off: January 27, 2010

24 Dispositive Motions to be Heard by: March 24, 2010

- 25 2. Plaintiff's counsel has requested an extension of the deadlines for fact and expert discovery
26 to permit additional discovery and due to his calendar in December and January.
27 3. Accordingly, the parties, by and through their counsel of record, stipulate that the deadlines
28 for fact and expert discovery, and dispositive motions be extended as follows:

Expert Disclosure: January 6, 2010

Rebuttal Expert Disclosure: January 27, 2010

Expert Discovery Cut-off: March 3, 2010

Non-Expert Discovery Cut-off: March 3, 2010

Dispositive Motions to be Heard by: April 28, 2010

4. The parties do not anticipate that the extended discovery deadlines will affect the trial date.
The trial date is currently set for July 26, 2010.

IT IS SO STIPULATED.

Respectfully submitted,

DATED: 12/2/09

BAUM & BLAKE

BY: /s/ David B. Baum
DAVID B. BAUM
Attorneys for Plaintiff

DATED: 12/2/09

JOSEPH P. RUSSONIELLO
United States Attorney

BY: /s/ Jennifer S Wang
JENNIFER S WANG
Assistant United States Attorney
Attorneys for Defendant

[PROPOSED] ORDER

Pursuant to the parties' stipulation and good cause having been shown, it is ordered that:

1. The deadline for expert disclosure is extended to January 6, 2010.
2. The deadline for rebuttal expert disclosure is extended to January 27, 2010.
3. The expert discovery cut-off date is extended to March 3, 2010.
4. The non-expert discovery cut-off date is extended to March 3, 2010.
5. The last date for dispositive motions hearing is extended to March 3, 2010.

IT IS SO ORDERED.

DATED: 12/3/09 _____



THE COURT REQUIRES 120 DAYS BETWEEN DISPOSITIVE MOTIONS HEARING DATE AND TRIAL.