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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

MONICA HOLMES,

Plaintiff,

vs.

UNITED STATES OF AMERICA,

Defendant.

CASE NO. 08-05619 PJH

**AMENDED STIPULATION TO EXTEND
DISCOVERY DEADLINES; [PROPOSED]
ORDER**

1. Pursuant to the Court’s April 13, 2009 Case Management and Pretrial Order, the deadlines for expert and fact discovery, and dispositive motions are as follows:
 - Expert Disclosure: December 2, 2009
 - Rebuttal Expert Disclosure: December 23, 2009
 - Expert Discovery Cut-off: January 27, 2010
 - Non-Expert Discovery Cut-off: January 27, 2010
 - Dispositive Motions to be Heard by: March 24, 2010
2. Plaintiff’s counsel has requested an extension of the deadlines for fact and expert discovery to permit additional discovery and due to his calendar in December and January.
3. Accordingly, the parties, by and through their counsel of record, stipulate that the deadlines for fact and expert discovery be extended as follows:

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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

- 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: 12/7/09

BAUM & BLAKE

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

DATED: 12/7/09

JOSEPH P. RUSSONIELLO
United States Attorney

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

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[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.

IT IS SO ORDERED.

DATED: 12/10/09 _____

