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IN THE UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF CALIFORNIA

ANGELIQUE PAIGE,
 Plaintiff,

vs.

NEW HAVEN UNIFIED SCHOOL
 DISTRICT; CITY OF UNION CITY;
 VERNON EDDINS, SR., DOES 1 through 50,
 inclusive,
 Defendants.

Case No.: C09-00687 PJH

**STIPULATED REQUEST FOR ORDER
 CHANGING TIME OF PRETRIAL
 CONFERENCE AND/OR PRETRIAL
 CONFERENCE DEADLINES**

The Parties, by and through their respective attorneys, hereby stipulate to the following request for an order changing time of the pretrial conference and/or pretrial conference deadlines:

1. The Pretrial Conference in this matter is currently set for Thursday, February 3, 2011 at 2:30 p.m.

- 1 2. Per this Court’s Pretrial Instructions, a joint pretrial statement, joint voir dire
2 instructions, joint jury instructions, trial briefs, motions in limine, deposition
3 excerpts, witness lists, exhibit lists, exhibit binders, proposed findings of fact and
4 conclusions of law, and proposed verdict forms are all due to be filed by
5 Thursday, January 6, 2011.
- 6 3. This Court made its decision on the motions for summary judgment on Thursday,
7 December 23, 2010. That decision necessarily impacted everything the parties
8 had to do to prepare the documents that are due on Thursday, January 6, 2011. In
9 effect, the parties had two weeks to prepare all those documents.
- 10 4. Two weeks is an inadequate amount of time to prepare all the documents due to
11 be filed on Thursday, January 6, 2011. The parties are working diligently on
12 getting these documents prepared, but have realized that they do not have
13 sufficient time to adequately prepare said documents so as to benefit the Court
14 and the parties at the pretrial conference. The parties’ progress on preparing these
15 documents has been hampered by the holiday season in which all counsel had
16 family plans and the illness of Plaintiff’s counsel, Arnold M. Woods, who was not
17 able to be at work much of the week before and after Christmas because of a flu
18 virus and bacterial infection.
- 19 5. As such, the parties jointly request that the pretrial conference be continued for
20 two weeks, to February 17, 2011, which would thereby continue the pretrial
21 conference deadlines by two weeks to January 20, 2011.
- 22 6. This requested time modification would result in a pretrial conference occurring
23 11 days before the scheduled trial date. The parties do not believe it would
24 impact the trial itself.
- 25

1 7. Alternatively, if the Court desires to keep the current pretrial conference date, the
2 parties would jointly request that the pretrial conference deadlines be continued
3 for two weeks to January 20, 2011.

4 8. This requested time modification would result in the Court having 14 days to
5 review the pretrial documents in advance of the pretrial conference. The parties
6 do not believe it would impact the trial in the matter.

7 9. Previously, the parties to this case sought and received an extension of scheduling
8 deadlines because of related cases and a requirement to coordinate discovery in
9 the cases. Plaintiff also sought and received a continuance of the summary
10 judgment hearing and deadlines because she was faced with responding to two
11 summary judgment motions at the same time. As the parties were awaiting the
12 Court's ruling on the summary judgment motions, they sought and received an
13 extension of time of the expert disclosures and discovery, so that the parties could
14 obtain the summary judgment ruling before incurring expert costs.

15 10. The parties originally made this request via a stipulated administrative motion on
16 Thursday, December 30, 2010, but were informed that the request should be made
17 pursuant to a stipulated request to change time and are so doing.

18 Dated this 5th day of January 2011.

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20 /s/ ARNOLD M. WOODS
21 WILLIAM DENKERS
22 ARNOLD M. WOODS
23 JOHN H. RUSSELL
24 Attorneys for PLAINTIFF ANGELIQUE PAIGE
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1 Dated this 5th day of January 2011.

LeCLAIR RYAN

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3 /s/ JOSEPH A. WHITECAVAGE
4 JOSEPH A. WHITE CAVAGE
5 Attorneys for Defendant New Haven Unified
6 School District

7 **ORDER**

8 PURSUANT TO THE STIPULATED REQUEST OF THE PARTIES, IT IS SO
9 ORDERED. The Court makes the following changes regarding the pretrial conference and the
10 pretrial conference deadlines:

- 11 1. Pretrial Conference to be held: February 17, 2011.
12 2. Deadline for parties to file all documents required to be filed in advance of the Pretrial
13 Conference pursuant to this Court's Pretrial Instructions: January 20, 2011

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16 Dated: January 6, 2011

