

1 STEPHEN P. BERZON (SBN 46540)
 SCOTT A. KRONLAND (SBN 171693)
 2 STACEY M. LEYTON (SBN 203827)
 PEDER J. THOREEN (SBN 217081)
 3 ANNE N. ARKUSH (SBN 254985)
 Altshuler Berzon LLP
 4 177 Post Street, Suite 300
 San Francisco, California 94108
 5 Telephone: (415) 421-7151
 Facsimile: (415) 362-8064
 6 sberzon@altshulerberzon.com
 skronland@altshulerberzon.com
 7 sleyton@altshulerberzon.com
 pthoreen@altshulerberzon.com
 8 aarkush@altshulerberzon.com

9 Attorneys for Plaintiffs

10 UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 11 SAN FRANCISCO/OAKLAND DIVISION

12	LYDIA DOMINGUEZ, et al.,)	Case No. C 09-02306 CW
)	
13	Plaintiffs,)	
)	<u>CLASS ACTION</u>
14	v.)	
)	STIPULATION AND ORDER
15	ARNOLD SCHWARZENEGGER, et al.,)	CONTINUING DEADLINES
)	
16	Defendants.)	
)	
17)	
)	

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1 WHEREAS, discovery in this case has been on-going;

2 WHEREAS, the present non-expert discovery cut-off is September 30, 2010, and expert
3 disclosures are due on September 30, 2010;

4 WHEREAS, the Parties believe that the current discovery deadlines have become unworkable
5 for a variety of reasons, including the unavailability of key witnesses of Defendants during the months
6 of May and June due to pressing budget-related activities; the fact that State Defendants' production of
7 voluminous electronic data regarding In-Home Supportive Services consumers and providers was
8 delayed by months for technical reasons and there is a need for additional time for expert analysis of this
9 data; the difficulty of scheduling Defendants' depositions of the individual and union Plaintiffs prior to
10 the discovery deadline after Magistrate Judge Larson resolved the parties' dispute regarding the number
11 of depositions Defendants could take; and the fact that, while discovery has been on-going, Plaintiffs
12 and Defendants have had to devote considerable time and resources to ongoing proceedings in this case
13 including the litigation of the temporary restraining order that was entered on June 29, 2010;

14 WHEREAS, the Parties have agreed upon a modest extension of the discovery and related
15 deadlines that they believe will allow for the completion of discovery while minimizing delay of trial;

16 WHEREAS, the Court has previously adjusted deadlines in this case six times (Dkt. #59, 62,
17 158, 179, 192, 281; *see also* Dkt. #94); however, only the most recent modification affected the initial
18 deadlines set by the Court for discovery, case-dispositive motions, or trial;

19 IT IS HEREBY STIPULATED between the parties through their respective counsel that, subject
20 to Court approval, the following schedule should replace that set by the Court in its Order Adopting
21 Stipulation Continuing Deadlines filed May 7, 2010 (Dkt. #281):

22	Completion of Fact Discovery	10/29/10
23	Disclosure of identities and reports of expert witnesses	
24	Initial	11/19/10
25	Rebuttal	12/17/10
26	Completion of Expert Discovery	01/21/11
27	Plaintiffs' Opening Brief re Dispositive Motions	02/17/11
28	Defendants' Opposition and Cross-Motion re Dispositive Motions	03/10/11

1 Plaintiffs' Reply and Opposition re Dispositive Motions 03/24/11
 2 Defendants' Surreply re Dispositive Motions 03/31/11
 3 Case Management Conference Statement due 04/07/11
 4 Hearing on Dispositive Motions and Case Management Conference 04/14/11 @ 2:00 p.m.
 5 Pretrial Conference 06/21/11 @ 2:00 p.m.
 6 Trial 07/05/11 @ 8:30 a.m.

8 Dated: September 30, 2010

Respectfully submitted,

STEPHEN P. BERZON
 SCOTT A. KRONLAND
 STACEY M. LEYTON
 PEDER J. THOREEN
 ANNE N. ARKUSH
 Altshuler Berzon LLP

By: /s/ Stacey M. Leyton

Attorneys for Plaintiffs

15 Dated: September 30, 2010

Respectfully submitted,

EDMUND G. BROWN JR.
 Attorney General of California
 SUSAN M. CARSON
 Supervising Deputy Attorney General
 JENNIFER A. BUNSHOFT
 Deputy Attorney General

By: /s/ Susan M. Carson

Attorneys for State Defendants

22 Dated: September 30, 2010

Respectfully submitted,

MICHAEL G. WOODS
 TIMOTHY J. BUCHANAN
 MANDY L. JEFFCOACH
 McCormick, Barstow, Sheppard,
 Wayte & Carruth LLP

By: /s/ Timothy J. Buchanan

Attorneys for Fresno Defendants

1 GENERAL ORDER 45 ATTESTATION

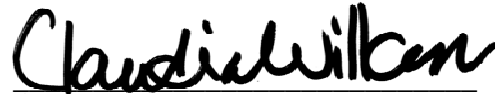
2 I, Stacey M. Leyton, am the ECF user whose ID and password are being used to file this
3 stipulation and proposed order. In compliance with General Order 45, X.B., I hereby attest that
4 Defendants' counsel have concurred in the filing of this document with their electronic signatures.

5
6 Dated: September 30, 2010

By: /s/ Stacey M. Leyton
Attorneys for Plaintiffs

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8 PURSUANT TO STIPULATION, IT IS SO ORDERED, except that the stipulation is declined
9 regarding the dispositive motion schedule and pretrial and trial dates. July 5 is not an available trial
10 date, and in any event would be too close to the motion hearing date. Counsel may consult with the
11 Courtroom Deputy regarding available trial dates and submit another stipulation. The dispositive
12 motion hearing date must be at least 90 days before the trial date.

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15 Dated: October 5, 2010


Honorable Claudia A. Wilken
United States District Court Judge