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Attorneys for Defendants

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

MARK ANTHONY JAEDEL SR.)	Case No.: 09-03181 CW
)	
Plaintiff,)	STIPULATION TO CONTINUE TRIAL
)	AND PRE-TRIAL DEADLINES
vs.)	
)	
THE COUNTY OF ALAMEDA, et al.,)	Complaint Filed: July 14, 2009
)	
Defendants.)	
)	
)	
)	

By Order dated October 12, 2010, this Court set the above referenced action for trial on November 28, 2011, at 8:30 a.m., in addition to many related pre-trial deadlines.

The parties have been working diligently to complete discovery. All parties have exchanged written discovery. The deposition of the plaintiff has been commenced but not completed. Numerous percipient witnesses have been identified and several will need to be subpoenaed for deposition. Plaintiff has taken the depositions of certain defendants and others are to be scheduled. Various issues requiring expert testimony have been identified, but the parties need additional time to complete non-expert discovery before their experts can be fully ready to offer their opinions. Due to scheduled trials with expert depositions in other cases pending for

1 both sides, the parties believe that it is in the interests of justice and judicial economy for the Court
2 to continue the present trial date and all pending pre-trial dates and they do hereby stipulate and
3 respectfully request that the Court continue said pending deadlines as follows:

4 Date of next case management conference: 4/3/2012

5 Completion of Fact Discovery: 12/9/2011

6 Disclosure of identities and reports of expert witnesses: 1/6/2012

7 Completion of Expert Discovery: 3/2/2012

8 All case-dispositive motions to be heard at 2:00 p.m. on or before: 4/3/2012

9 Plaintiffs' counsel intends to file a Motion for Summary Judgment. Plaintiffs' opening
10 brief due: 2/17/12

11 Defendants' opposition/cross motion (contained within a single brief) due: 3/2/2012

12 Plaintiffs' reply/opposition to cross motion (contained within a single brief) due: 3/9/2012

13 Defendants' reply due: 3/16/2012

14 Final Pre-Trial Conference at 2:00 p.m. on: 5/22/2012

15 A 5 day Jury Trial will begin at 8:30 a.m. on: 6/4/2012

16 Accordingly, the parties respectfully request and jointly stipulate to the above listed
17 continuances.

18 It is so stipulated.

19
20 DATED: July 7, 2011

21 BOORNAZIAN, JENSEN & GARTHE
22 A Professional Corporation

23 By: /s/Gregory J. Rockwell
24 GREGORY J. ROCKWELL, ESQ.
25 Attorneys for Defendants
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1 DATED: July 7, 2011

2 JOHN R. COGORNO, Attorney At Law

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4 By: /s/ John R. Cogorno

5 JOHN R. COGORNO, ESQ.
6 Attorneys for Plaintiff

7 **ORDER**

8 GOOD CAUSE appearing therefor, and the parties having so stipulated, it is hereby
9 ordered that the above listed continuances are GRANTED, **except that the case management**
10 **conference and motion hearing will be held on April 5, 2012, not April 3.**

11 Dated: 9/9/2011

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13 
14 CLAUDIA WILKEN
15 United States District Judge

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