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15 Attorneys for Defendant COUNTY OF SONOMA

17 **UNITED STATES DISTRICT COURT**  
 18 **NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

20 SONOMA COUNTY ASSOCIATION OF  
 RETIRED EMPLOYEES,  
 21  
 Plaintiff,  
 22  
 v.  
 23 SONOMA COUNTY,  
 24  
 Defendant.

CASE NO. CV 09-4432 CW  
 MODIFIED  
**STIPULATION AND ~~PROPOSED~~**  
**ORDER EXTENDING TIME AND**  
**SETTING CASE SCHEDULE**

Judge: Hon. Claudia Wilken

1 Plaintiff Sonoma County Association of Retired Employees (“SCARE” or "Plaintiff") and  
2 Defendant County of Sonoma (the “County” or "Defendant") (collectively the “Parties”), by and  
3 through their respective counsel of record, hereby enter into the following stipulated request for an  
4 order extending time pursuant to Local Rule 6-2 and related orders.

5 WHEREAS, Plaintiff filed a Motion for Partial Summary Judgment on May 28, 2015;

6 WHEREAS, the current summary judgment motion ("dispositive motion" or "dispositive  
7 motions") and case schedule (ECF 163) provides that Defendant’s opposition to Plaintiff’s  
8 dispositive motion its and dispositive cross-motion are due on June 25, 2015, Plaintiff’s reply in  
9 support of its dispositive motion and/or opposition to Defendant’s dispositive cross-motion are  
10 due July 9, 2015, Defendant’s reply in support of its dispositive cross-motion is due July 23, 2015,  
11 the Parties’ dispositive motions are to be heard 14 days after Defendant's reply, or as soon  
12 thereafter as the Court schedules a hearing, the fact discovery cut-off is June 23, 2015, and the  
13 expert discovery cut-off is July 7, 2015;

14 WHEREAS, the Parties wish to establish the below case schedule to allow additional time  
15 to prepare dispositive motion papers, to facilitate the completion of limited remaining discovery,  
16 and to have a hearing on a date available to both lead attorneys;

17 **THEREFORE, IT IS STIPULATED THAT:**

18 The current case schedule shall be modified as follows:

<i>Event</i>	<i>Deadline</i>
Fact Discovery Cut-off	<b>June 23, 2015</b> , except (i) Defendant may take the depositions of Bill Robotka and Nick Velichinsky as agreed by Plaintiff, (ii) Plaintiff may take the deposition of Dania Torres Wong as agreed by Defendant, (iii) Defendant may re-open the deposition of Ray Myers as agreed by Plaintiff, and (iv) discovery motions by either Plaintiff or Defendant limited to challenging (a) the withholding of documents solely on the grounds identified in privilege logs, including but not limited to attorney-client privilege, work product, deliberative process privilege, closed session, mediation privilege, and Evidence Code § 1152, and (b) assertions of privilege at the depositions identified above in items (i) through (iii), including in objections to any accompanying subpoenas.

<i>Event</i>	<i>Deadline</i>
	The fact discovery cut-off date for the completion of the Robotka, Velichinsky, Myers and Wong depositions and the filing of any motion pursuant to item (iv) is <b>July 21, 2015</b> .
Expert Discovery Cut-off	<b>August 14, 2015</b>
County's dispositive motion and opposition to Plaintiff's dispositive motion Due [35 page brief]	<b>July 23, 2015</b>
SCARE's Reply to County dispositive motion Due [25 page brief]	<b>September 8, 2015</b>
County's Reply to Plaintiff's opposition to County's dispositive motion Due [15 page brief]	<b>October 1, 2015</b>
Hearing on Dispositive Motions and Case Management Conference	<b>October 15, 2015</b> or as soon thereafter as the Court schedules a hearing.

DATED: June 15, 2015

LEWIS, FEINBERG, LEE & JACKSON, P.C.

By: /s/ Darin Ranahan

JEFFREY LEWIS  
DARIN RANAHAN  
LINDA LAM  
Attorneys for Plaintiff  
SONOMA COUNTY ASSOCIATION OF  
RETIRED EMPLOYEES

DATED: June 15, 2015

HANSON BRIDGETT LLP

By: /s/ Batya F. Forsyth

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Attorneys for Defendant  
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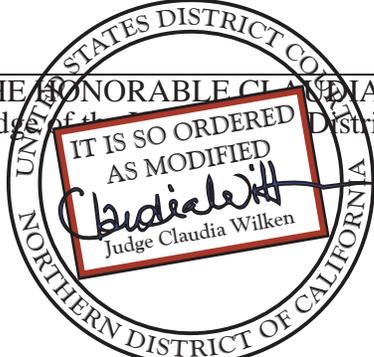
This Court, having considered the Parties' stipulated request for the above modified case schedule, hereby GRANTS said request. The case schedule shall be:

<i>Event</i>	<i>Deadline</i>
Fact Discovery Cut-off	<p><b>June 23, 2015</b>, except (i) Defendant may take the depositions of Bill Robotka and Nick Velichinsky as agreed by Plaintiff, (ii) Plaintiff may take the deposition of Dania Torres Wong as agreed by Defendant, (iii) Defendant may re-open the deposition of Ray Myers as agreed by Plaintiff, and (iv) discovery motions by either Plaintiff or Defendant limited to challenging (a) the withholding of documents solely on the grounds identified in privilege logs, including but not limited to attorney-client privilege, work product, deliberative process privilege, closed session, mediation privilege, and Evidence Code § 1152, and (b) assertions of privilege at the depositions identified above in items (i) through (iii), including in objections to any accompanying subpoenas.</p> <p>The fact discovery cut-off date for the completion of the Robotka, Velichinsky, Myers and Wong depositions and the filing of any motion pursuant to item (iv) is <b>July 21, 2015</b>.</p>
Expert Discovery Cut-off	<b>August 14, 2015</b>
County's dispositive motion and opposition to Plaintiff's dispositive motion Due [ <b>35 page brief</b> ]	<b>July 23, 2015</b>
SCARE's Reply to County's dispositive motion Due [ <b>25 page brief</b> ]	<b>September 8, 2015</b>
County's Reply to Plaintiff's opposition to County's dispositive motion Due [ <b>15 page brief</b> ]	<b>October 1, 2015</b>
Hearing on Dispositive Motions and Case Management Conference	<b>October 15, 2015</b> or as soon thereafter as the Court schedules a hearing.

**PURSUANT TO STIPULATION, IT IS SO ORDERED AS MODIFIED.**

Dated: 06/16, 2015

THE HONORABLE CLAUDIA WILKEN  
 Judge of the Northern District Court



IT IS SO ORDERED AS MODIFIED  
 Claudia Wilken  
 Judge Claudia Wilken