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19 **UNITED STATES DISTRICT COURT**

20 **NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

22 SONOMA COUNTY ASSOCIATION OF
RETIRED EMPLOYEES,

23 Plaintiff,

24 v.

25 SONOMA COUNTY,

26 Defendant.

CASE NO. CV 09-4432 CW

27 **STIPULATION AND ORDER RE CASE
SCHEDULE**

Judge: Hon. Claudia Wilken

1 Plaintiff Sonoma County Association of Retired Employees ("Plaintiff") and
2 Defendant County of Sonoma ("Defendant") (collectively the "Parties"), by and through
3 their respective counsel of record, hereby stipulate to the following schedule and request
4 that the Court issue an Order regarding the case schedule.

5 WHEREAS, on January 10, 2014, the Court issued its Order granting in part, and
6 denying in part, Defendant's motion to dismiss (Dkt. No. 96);

7 WHEREAS, prior to the Court's order granting in part Defendant's motion to
8 dismiss, the Parties stipulated to a number of case deadlines based on the anticipated
9 filing of Defendant's answer, including a dispositive motion briefing schedule, a
10 dispositive motion hearing date, a deadline for expert disclosure, and a discovery cutoff
11 date, which stipulation the Court granted (Dkt. Nos. 94-95);

12 THEREFORE, Plaintiff Sonoma County Association of Retired Employees and
13 Defendant County of Sonoma hereby stipulate to the following case schedule:

14 • Plaintiff's dispositive motion is due on September 5, 2014 (224 days from
15 January 24, 2014, the date Defendant filed its answer to Plaintiff's Second Amended
16 Complaint);

17 • Defendant's opposition thereto and dispositive cross-motion are due on
18 October 3, 2014 (28 days after Plaintiff's dispositive motion is filed);

19 • Plaintiff's reply in support of its dispositive motion and/or opposition to
20 Defendant's dispositive cross-motion are due on October 17, 2014 (14 days after
21 Defendant's cross-motion and opposition is filed);

22 • Defendant's reply in support of its dispositive cross-motion is due on
23 October 31, 2014 (14 days after Plaintiff files its opposition to Defendant's cross-motion);

24 • The parties' dispositive motions will be heard on November 20, 2014 at 2
25 p.m., or as soon thereafter as the Court schedules the hearing (the first civil law and
26 motion calendar after 294 days from the date Defendant filed its answer);

27 • The deadline for expert disclosure is December 15, 2014 (323 days from
28 the date Defendant files its answer); and

1 • The cutoff for both expert and non-expert discovery is February 12, 2015
2 (384 days from the date Defendant filed its answer).
3

4 **IT IS SO STIPULATED.**

5 DATED: February 28, 2014

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

7
8 By: /s/ Jeffrey Lewis

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13 DATED: February 28, 2014

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15 By: /s/ Raymond F. Lynch

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DATED: February 28, 2014 HANSON BRIDGETT LLP

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1 **ORDER**

2 The court, having reviewed the above Stipulation Re Case Schedule, HEREBY
3 ADOPTS THE STIPULATION AND SO ORDERS:

- 4 • Plaintiff's dispositive motion is due on September 5, 2014 (224 days from
5 January 24, 2014, the date Defendant filed its answer);
- 6 • Defendant's opposition thereto and dispositive cross-motion are due on
7 October 3, 2014 (28 days after Plaintiff's dispositive motion is filed);
- 8 • Plaintiff's reply in support of its dispositive motion and opposition to
9 Defendant's dispositive cross-motion are due on October 17, 2014 (14 days after
10 Defendant's cross-motion and opposition are due on October 6, 2014);
- 11 • Defendant's reply in support of its dispositive cross-motion is due on
12 October 31, 2014 (14 days after Plaintiff files its opposition to Defendant's cross-motion);
- 13 • The Parties' dispositive motions will be heard on November 20, 2014, at 2
14 p.m., or as soon thereafter as the Court schedules the hearing (the first civil law and
15 motion calendar after 294 days from the date Defendant filed its answer;
- 16 • The deadline for expert disclosures is December 15, 2014 (323 days from
17 January 24, 2014);
- 18 • The cutoff for both expert and non-expert discovery will be February 12,
19 2015 (384 days from January 24, 2014); and
- 20 • The discovery stay was lifted on January 24, 2014, the date Defendant filed
21 its answer to the Second Amended Complaint.

22 **IT IS SO ORDERED.** A further case management conference will be heard on
23 November 20, 2014 along with the dispositive motions.

24
25 Dated: March 3, 2014


HONORABLE CLAUDIA WILKEN