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9 UNITED STATES DISTRICT COURT
 10 NORTHERN DISTRICT OF CALIFORNIA
 11 OAKLAND DIVISION

12 JAMES ELLIS JOHNSON,
 13 Plaintiff,
 14 v.
 15 UNITED STATES,
 16 Defendant.
 17

No. C 10-0647-LB

**STIPULATION AND [PROPOSED] ORDER
 TO EXTEND CASE MANAGEMENT
 DEADLINES**

18 Plaintiff, proceeding pro se, and Defendant, by and through its attorneys of record, hereby
 19 stipulate, subject to approval of the Court, to the following:

20 1. Counsel for Defendant has been invited to participate in training to become a mediator on
 21 the Mediation Panel for the United States District Court, Northern District of California. The
 22 mandatory mediator training consists of 4 full days, and counsel is scheduled to attend from
 23 9:00am to 5:00pm on February 10-11, 2011 and March 4-5, 2011. Therefore, the mandatory
 24 training conflicts with the Further Case Management Conference in this matter which currently is
 25 scheduled for February 10, 2011 at 1:30pm.

26 2. Furthermore, Plaintiff will be out of state in Louisiana attending to personal matters from
 27 February 11, 2011 until on or about March 6, 2011.

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1 3. The Defendant and Plaintiff therefore request that the Court extend the following Case
2 Management Deadlines by approximately 30 days as follows:

3 Further Case Management Conference - 3/10/11 at ~~1:30pm~~ 10:30 a.m.

4 Non-Expert Discovery Completion Date - 4/10/11

5 Expert disclosures required by Federal Rules of Civil Procedure - 4/10/2011

6 Rebuttal expert disclosures - 4/25/2011

7 Expert discovery completion date - 5/25/2011

8 Last hearing date for dispositive motions - 7/21/2011, at 11:00 a.m.

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10 DATED: January 24, 2011

MELINDA L. HAAG
United States Attorney

11
12 /s/

JUAN D. WALKER
Special Assistant United States Attorney
Attorneys for Defendant

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16 DATED: January 24, 2011

/s/

JAMES ELLIS JOHNSON

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18
19
20 **[PROPOSED] ORDER**

21 Pursuant to stipulation, IT IS SO ORDERED.

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23 Dated: January 25, 2011

