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10 Plaintiff Pro Se

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 12 UNITED STATES DISTRICT COURT
 13 NORTHERN DISTRICT OF CALIFORNIA
 14 OAKLAND DIVISION

15 JAMES ELLIS JOHNSON,
 16 Plaintiff,
 17 v.
 18 UNITED STATES,
 19 Defendant.
 20

No. C 10-0647-LB

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

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

23 1. Counsel for Defendant was recently assigned as co-trial counsel in another matter in which
 24 fact discovery closes on May 2, 2011. The plaintiff's deposition in that matter has been scheduled
 25 for April 7, 2011, and it conflicts with the Further Case Management Conference in this matter
 26 which currently is scheduled for April 7, 2011 at 10:30 a.m.

27 2. Furthermore, the parties have discussed their need for more time to complete discovery in
 28 this matter while keeping in mind the Court's preference that the trial date not be altered.

3. Accordingly, the parties request that the Court adopt the following schedule:

Further Case Management Conference	4/14/2011 at 10:30am
Non-Expert Discovery Completion Date	5/10/2011
Expert disclosures required by Federal Rules of Civil Procedure	5/10/2011
Rebuttal expert disclosures	5/25/2011
Expert discovery completion date	6/25/2011
Last hearing date for dispositive motions	7/21/2011, at 11:00 a.m. 7/28/11 at 11:00 a.m.
Meet and confer re pretrial filing	8/23/2011
Pretrial filings due	9/1/2011
Opposition, Objections, Exhibits, and Depo Designations due	9/8/2011
Final Pretrial Conference	9/22/2011, at 1:30 p.m.
Trial	10/3/2011, at 8:30 a.m.
Length of Trial	4 days

DATED: March 23, 2011

MELINDA L. HAAG
United States Attorney

/s/

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

DATED: March 23, 2011

/s/

JAMES ELLIS JOHNSON
Plaintiff Pro Se

[PROPOSED] ORDER

Pursuant to stipulation, IT IS SO ORDERED.

Dated: March 25, 2011

LAUREL BEELER
United States Magistrate Judge

