

1 LOUIS A. LEONE, ESQ. (SBN: 099874)  
2 CLAUDIA LEED, ESQ. (SBN: 122676)

**STUBBS & LEONE**

3 A Professional Corporation  
4 2175 N. California Blvd., Suite 900  
5 Walnut Creek, CA 94596  
6 Telephone: (925) 974-8600  
7 Facsimile: (925) 974-8601  
8 E-mail: [leonel@stubbsleone.com](mailto:leonel@stubbsleone.com)  
9 [leedc@stubbsleone.com](mailto:leedc@stubbsleone.com)

10 Attorneys for Defendants

11 THE REGENTS OF THE UNIVERSITY OF CALIFORNIA,  
12 PAMELA E. ROSKOWSKI, JON EASTERBROOK, and  
13 BARNEY RIVERA

14 PAMELA Y. PRICE, ESQ. (SBN:107713)

15 PRICE AND ASSOCIATES

16 901 Clay Street  
17 Oakland, California 94607  
18 Telephone: (510) 452-0292  
19 Facsimile: (510) 452-5625  
20 E-mail: [pamela.price@pypesq.com](mailto:pamela.price@pypesq.com)

21 Attorneys for Plaintiff

22 REGGIE HAMILTON

23 CURTIS E. ALLEN, ESQ. (SBN: 187748)

24 LAW OFFICE OF CURTIS ALLEN

25 303 Twin Dolphin Drive, Sixth Floor  
26 Redwood City, California 94065  
27 Telephone: (650) 868-6620  
28 Facsimile: (650) 362-1864  
E-mail: [curtis.e.allen.esq.@gmail.com](mailto:curtis.e.allen.esq.@gmail.com)

Attorneys for Plaintiff

REGGIE HAMILTON

1 UNITED STATES DISTRICT COURT  
2 NORTHERN DISTRICT OF CALIFORNIA

3 REGGIE HAMILTON,  
4

5 Plaintiff,

6 vs.

7  
8 THE REGENTS OF THE UNIVERSITY OF  
9 CALIFORNIA, PAMELA E. ROSKOWSKI,  
10 JON EASTERBROOK, BARNEY RIVERA  
11 and DOES 1 through 15,

12 Defendants.

**Case No.: C10-01622 DMR**

**STIPULATION AND PROPOSED  
ORDER RESCHEDULING THE CASE  
MANAGEMENT CONFERENCE AND  
CONTINUING DISCOVERY  
DEADLINES AS MODIFIED**

13 The parties to the above captioned action hereby stipulate by and through their  
14 undersigned counsel of record to request that this court continue the 1:30 p.m.  
15 November 2, 2011 Case Management Conference to 1:30 p.m. December 14, 2011, or  
16 as soon thereafter as it may please the Court.

17 The parties also hereby stipulate by and through their undersigned counsel of  
18 record to request that this court continue the lay and expert witness discovery deadlines  
19 by approximately thirty days as set for the below.

20 Good cause exists for the above requests, as follows:

- 21 1. At the October 11, 2011 settlement conference before Magistrate Judge  
22 Joseph C. Spero the parties reached a settlement in principle.  
23 2. At the settlement conference the parties set a three week check-in time  
24 (November 1, 2011) with Magistrate Judge Spero.  
25 3. On October 11, 2011 the parties stayed ongoing discovery for three weeks to  
26 November 1, 2011 in light of the settlement in principle.  
27 4. The parties are currently working on the details of settlement, some of which  
28 require the Regents to seek detailed internal guidance.

- 1 5. It is anticipated that a completed settlement agreement will be executed by all  
 2 parties on or before November 20, 2011, and that the completed settlement  
 3 agreement will obviate the need for further litigation in the matter.
- 4 6. The deadline to complete lay discovery and designate expert witnesses is  
 5 currently November 7, 2011, and the deadline to complete expert witness  
 6 discovery is December 5, 2011.
- 7 7. The last day to hear dispositive motions is January 5, 2012 and the Final  
 8 Pretrial Conference Statement and Trial Briefs are due February 4, 2012.
- 9 8. Continuing the lay discovery and expert witness disclosure deadline to  
 10 December 14, 2011 and the completion of expert discovery to January 13,  
 11 2012 will allow the parties to focus all of their attention on settlement the  
 12 matter.

13 Given all of the above, a continuance of the Case Management Conference and  
 14 Discovery deadlines will serve judicial economy and spare the parties considerable and  
 15 likely needless discovery-related expense.

16 **IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.**

17 DATED: October 31, 2011

**PRICE AND ASSOCIATES**

18  
 19 /S/

20 PAMELA Y. PRICE, ESQ.  
 21 Attorneys for Plaintiff REGGIE  
 HAMILTON

22 DATED: October 31, 2011

**LAW OFFICE OF CURTIS E. ALLEN**

23  
 24 /S/

25 CURTIS E. ALLEN, ESQ.  
 26 Attorneys for Plaintiff REGGIE  
 27 HAMILTON

1 DATED: October 31, 2011

STUBBS & LEONE

3 \_\_\_\_\_ /S/

4 CLAUDIA LEED, ESQ.  
5 Attorneys for Defendants THE  
6 REGENTS OF THE UNIVERSITY OF  
7 CALIFORNIA,  
8 PAMELA E. ROSKOWSKI, JON  
9 EASTERBROOK, and BARNEY  
10 RIVERA

9 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

10 The 1:30 p.m. November 2, 2011 Case Management Conference is continued to  
11 1:30 p.m. December 14, 2011. An updated joint Case Management Conference  
12 statement shall be filed by December 7, 2011. The deadline to complete all lay  
13 discovery and to designate expert witnesses is continued to December 14, 2011. The  
14 deadline to complete expert witness discovery is continued to January 13, 2012.

15 DATED: \_\_\_\_\_ November 1, 2011

16   
17 \_\_\_\_\_  
18 DONNA M. RYU  
19 United States Magistrate Judge