1 Mary Shea Hagebols (SBN 113222) SHEA LAW OFFICES 1814 Franklin Street, Suite 800 Oakland, CA 94612 3 Tel: 510-208-4422 4 Fax: 415-520-9407 Email: shealaw@aol.com 5 6 Jeffrey William Allen (SBN 99240) Nina Paul (SBN 249954) 7 VAN DE POEL, LEVY & ALLEN, LLP 1600 South Main Plaza, Suite 325 8 Walnut Creek, CA. 94596 925-934-6102 Tel: 9 Fax: 925-934-6060 10 Email: jallen@vanlevylaw.com 11 Attorneys for Plaintiff Janet Haley 12 13 14 UNITED STATES DISTRICT COURT 15 NORTHERN DISTRICT OF CALIFORNIA 16 (Oakland) 17 18 JANET HALEY, Civil Action No. C10-03856-PJH 19 Plaintiff, |PROPOSED| ORDER GRANTING 20 PLAINTIFF JANET HALEY'S MOTION VS. FOR ADMINISTRATIVE RELIEF FOR 21 EXTENSION OF THE DEADLINE TO **COHEN & STEERS CAPITAL** PRODUCE EXPERT REPORTS 22 MANAGEMENT, INC., A New York FRCP 26(a)(2)(B)(i); FRCP 16(b)(4); Civil 23 Local Rule 7-11 Corporation Doing Business in California; and 24 DAVID EDLIN, an individual; 25 **Complaint Filed:** August 27, 2010 Defendants. 1st Am. Complaint Filed: November 16, 2010 26 Trial Date: July 23, 2012 27 28 {00851359.DOC;1} [PROPOSED] ORDER Civil Action No. C10-03856-PJH - 1 -

1 Plaintiff Janet Haley's Motion for Administrative Relief for Extension of the Deadline to 2 Produce Expert Reports pursuant to FRCP 26(a)(2)(B)(i), FRCP 16(b)(4) and Civil Local Rule 7-3 11 was properly presented to the Honorable Phyllis J. Hamilton, United States District Court 4 Judge on December 20, 2011. Defendants having received timely and proper notice, and for 5 good cause showing, 6 THE COURT HEREBY FINDS: 7 Plaintiff has good cause for requesting an extension of the deadline to produce expert 8 reports given that Plaintiff would be harmed should the relief not be granted, no parties will be 9 prejudiced by extending the deadline to produce expert reports, and the extension will not impact 10 the schedule for the case. Having considered Plaintiff's Motion for Administrative Relief, the Declaration of Nina 11 12 Paul, the Declaration of Jeffrey W. Allen, the files and records in this action, and for good cause 13 appearing therefore, 14 IT IS HEREBY ORDERED that Plaintiff's Motion for Administrative Relief is hereby 15 granted and that Plaintiff shall be afforded relief pursuant to FRCP 16(b)(4). Specifically, 16 The new deadline for the parties to produce expert reports shall be: February 3, 2012 17 18 19 Dated: 12/23/2011 20 UNITED STATES DISTRICT COURT JUDGE 21 22 23 24 25 26 27 28 {00851359.DOC;1} (PROPOSED) ORDER Civil Action No. C10-03856-PJH