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1 an amended schedule to provide to the Court. Assuming that the existing claims and parties to do
2 not change, ^J the Parties stipulate as follows:

3 1. The Parties may initiate discovery on April 28, 2011.

4 2. All written discovery, including any document requests, interrogatories, or requests
5 for admission, shall be responded to within two weeks of service and the Parties shall serve each
6 other via electronic email.

7 3. All documents that were attached to the Parties' mediation briefs submitted to Judge
8 Legge at JAMS shall be treated as if produced in this litigation.

9 4. Where document requests are served, in addition to service of a written response, the
10 parties must respond by producing actual documents within two weeks of service of the requests.

11 5. The parties will use their best efforts to resolve any objections to the written discovery
12 requests in an expeditious manner.

13 6. All discovery requests and responses, including responsive documents, shall be
14 served by email.

15 7. The Parties shall make their Initial Disclosures on or before May 16, 2011.

16 8. All discovery shall be completed by October 3, 2011.

17 9. Any expert witnesses shall be disclosed and reports served by August 1, 2011.

18 10. Any rebuttal expert witnesses shall be disclosed and reports served on or before
19 August 22, 2011.

20 ~~11. Any dispositive motions shall be filed within 60 days of the discovery cut-off,~~
21 ~~October 3, 2011.~~

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22 ~~12. Thereafter, the Court will set a pretrial conference, at which time other dates,~~
23 ~~including, if necessary, a trial date, will be scheduled.~~

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Zelle Hofmann Voelbel & Mason LLP
44 Montgomery Street - Suite 3400
San Francisco, CA 94104

1 IT IS SO STIPULATED.

2
3 Dated: April ___, 2011

SHARTSIS FRIESE LLP

4
5 By: _____
Frank A. Cialone

6 Frank A. Cialone (State Bar No. 172816)
7 SHARTSIS FRIESE LLP
8 One Maritime Plaza
9 Eighteenth Floor
10 San Francisco, CA 94111
11 Telephone: (415) 421-6500
12 Facsimile: (415) 421-2922

13 Ben Furth (State Bar No. 203763)
14 THE FURTH LAW FIRM PA
15 780 Walnut #5
16 Las Cruces, NM 88001
17 Telephone: (575) 680-2968
18 Facsimile: (575) 532-5815

Attorneys for Plaintiff Ben Furth

19 Dated: April ___, 2011

ZELLE HOFMANN VOELBEL & MASON LLP

20
21 By: _____
Daniel S. Mason

22 Daniel S. Mason (State Bar No. 54065)
23 Eric W. Buetzow (State Bar No. 253803)
24 ZELLE HOFMANN VOELBEL & MASON LLP
25 44 Montgomery Street, Suite 3400
26 San Francisco, CA 94104
27 Telephone: (415) 693-0700
28 Facsimile: (415) 693-0770

Attorneys for Defendant Frederick P. Furth

29 I, Frank A. Cialone, hereby attest, pursuant to N.D. Cal. General Order No. 45, that the
30 concurrence to the filing of this document has been obtained from each signatory hereto.

31 _____
32 Frank A. Cialone

1 PURSUANT TO STIPULATION, IT IS SO ORDERED.

*as modified by the Court
to be consistent with the parties'
agreements on the record
at the April 28, 2011
case management conference*

DMR

3 Dated: 4/28, 2011



The Honorable Donna M. Ryu
United States Magistrate Judge
Northern District of California
Oakland Division

Zelle Hofmann Voelbel & Mason LLP
44 Montgomery Street - Suite 3400
San Francisco, CA 94104

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