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5	Facsimile: (707) 524-1906 spaulding@smlaw.com; sterling@smlaw.com		
6	Attorneys for Defendant		
7	COUNTY OF NAPA		
8	UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA		
9			
10	GAYLE BROCK,	Case No.: CV 11-0257 SBA	
11	Plaintiff,	STIPULATION AND [ <del>PROPOSED</del> ] ORDER	
12	vs.	EXTENDING TIME TO FILE REPLY PAPERS	
13	COUNTY OF NAPA and DOES 1 through 50, inclusive,	Date: June 15, 2012	
14	Defendants.	Time: 1:30 pm Ctrm: G, 15 <sup>th</sup> Floor	
15		Magistrate Judge Joseph C. Spero	
16		PreTrial Conference: July 10, 2012 Trial Date: July 16, 2012	
17			
18	Plaintiff GAYLE BROCK and defendant COUNTY OF NAPA ("County") hereby enter into		
19	this Stipulation Extending Time To File Reply Pape	rs with reference to the following facts:	
20	On April 17, 2012, plaintiff filed her Motion to Preclude Defendant from Using Late		
21	Produced Documents at Trial; for Default or Dismissal in Favor of Plaintiff if it Pleases the Court; for		
22	Attorney Fees and Costs; and for Other Sanctions Deemed Appropriate by the Court ("Sanctions		
23	Motion"). The Sanctions Motion was originally set for hearing on May 22, 2012, but on April 24,		
24	2012, the Court continued the hearing date to June 15, 2012. The Court did not change the dates for		
25	opposition or reply papers. On May 1, 2012, the County filed its Opposition to the Sanctions Motion		
26	based on the briefing schedule mandated by the original May 22, 2012 hearing date.		
27	The deadline for filing reply papers based on the original briefing schedule is May 8, 2012. In		
28	order to properly address the numerous legal and factual issues raised by the Sanctions Motions,		
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1	plaintiff requires additional time to file her reply papers. In light of the continuance of the hearing	
2	date for the Sanctions Motion, the requested extension of the deadline for filing reply papers will no	
3	unduly limit the time available for the Court to prepare for the hearing on the Motion.	
4	IT IS HEREBY STIPULATED by and between plaintiff GAYLE BROCK and defendant	
5	COUNTY OF NAPA, through their attorneys of record, that the deadline for reply papers to be filed	
6	in connection with the Sanctions Motion shall be continued to May 11, 2012.	
7	DATED: May 4, 2012	SPAULDING McCULLOUGH & TANSIL LLP Attorneys for Defendant
8		COUNTY OF NAPA
9		
10		By: /s/ Terry S. Sterling Terry S. Sterling
11	DATED: March 2012	LAW OFFICE OF LEGGE C. TUDNED
12	DATED: May 4, 2012	LAW OFFICE OF JESSE S. TURNER Attorneys for Plaintiff GAYLE BROCK
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15		By: /s/ Jesse S. Turner Jesse S. Turner, Esq.
16		Jesse B. Turner, Esq.
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1		[PROPOSED] ORDER
2	IT IS SO ORDERED.	STATE OF THE STATE
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4	DATED:5/14/12	H G DISTRICTOR
5		U.S. DISTRICTO  Judge Joseph C. Spero
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7		DISTRICT OF COM
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STIPULATION AND [PROPOSED] ORDER EXTENDING TIME TO FILE REPLY PAPERS

Case No. CV 11-0257 SBA