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 JACQUEZ, MCGUYER, AND BRADBURY

18 UNITED STATES DISTRICT COURT  
 19 NORTHERN DISTRICT OF CALIFORNIA  
 20 OAKLAND DIVISION

21 SERGIO ALVAREZ,  
 22 Plaintiff,  
 23 vs.  
 24 G.D. LEWIS, et al.,  
 25 Defendants.  
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Case No. C 11-2034 JSW (DMR)  
**STIPULATION AND ~~PROPOSED~~  
 ORDER TO ENLARGE TIME FOR  
 EXPERT DISCOVERY CUTOFF**  
 Dept.: Courtroom 5 – 2nd Floor  
 Judge: Hon. Jeffrey S. White  
 Trial Date: January 12, 2015

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1 In accordance with Northern District Local Rules 7-12 and 6-2, counsel for both parties  
2 submit this Stipulation and Proposed Order to extend the expert discovery cutoff, which is set for  
3 August 27, 2014.

4 In support thereof, the parties state:

5 The parties have scheduled a second settlement conference in front of Judge Vadas for  
6 September 12, 2014. *See* Declaration of Jessica Mohr, filed concurrently herewith, at ¶ 2. In an  
7 effort to avoid incurring potentially unnecessary costs associated with expert discovery, the parties  
8 would like to extend the expert discovery cutoff for the limited purpose of allowing the parties to  
9 depose their experts at a later date in the event the case does not settle. *Id.* at ¶ 3. Further, and  
10 without waiving any objections, the parties have agreed to produce documents responsive to the  
11 currently outstanding document subpoenas three days prior to each expert's deposition, to the extent  
12 the depositions are scheduled. *Id.*

13 Accordingly, the parties stipulate that expert discovery should be extended to October 15,  
14 2014, for the limited purpose stated above. Further, the parties stipulate that the last date for hearing  
15 on *Daubert* motions should be extended as well, to account for the additional expert discovery. The  
16 parties have suggested October 31, 2014, which is available on the Court's calendar, as the last date  
17 to hear *Daubert* motions, but are amenable to any date which is convenient for the Court.

18 The proposed new dates are as follows:

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Deadline	Current Date	New Date
Expert Discovery Cutoff	August 27, 2014	October 15, 2014
Hearing on <i>Daubert</i> Motions	September 12, 2014	October 31, 2014

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Dated: August 25, 2014

WEIL, GOTSHAL & MANGES LLP

By: /s/ Christopher J. Cox  
CHRISTOPHER J. COX

Attorneys for Plaintiff  
SERGIO ALVAREZ

Dated: August 25, 2014

ATTORNEY GENERAL OF CALIFORNIA

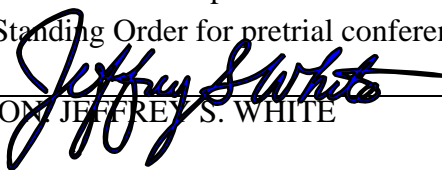
By: /s/ Sara Van Loh  
SARA VAN LOH

Attorneys for Defendants SILVEIRA,  
BARNEBURG, BRANDON,  
ROSENBERG, CATE, PIMENTEL,  
WISE, JACQUEZ, MCGUYER, AND  
BRADBURY

I, Christopher J. Cox, am the ECF User whose ID and password are being used to file the Stipulation and Proposed Order to Enlarge Time for Expert Discovery Cutoff and Declaration of Jessica Mohr in Support thereof by Parties and Counsel. In compliance with Local Rule 5-1(i)(3), concurrence in the filing of the Stipulated Request and Declaration has been obtained from Sara D. Van Loh, counsel for Defendants, and I shall maintain records to support this concurrence for subsequent production for the Court if so ordered or for inspection upon request by a party.

PURSUANT TO STIPULATION, IT IS ~~SO~~ ORDERED: that the deadline for expert discovery is CONTINUED to October 15, 2014. Any motions to exclude expert witnesses shall be brought by motions in limine in accordance with the Court's Standing Order for pretrial conferences.

Dated: September 5, 2014

  
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HON. JEFFREY S. WHITE