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11 Attorneys for Defendant  
 TARGET CORPORATION

12  
 13 UNITED STATES DISTRICT COURT  
 14 NORTHERN DISTRICT OF CALIFORNIA

15 LESLIE BROWN and SHANE BROWN,	)	Case No. 4:17-cv-04818-HSG
	)	
16 Plaintiffs,	)	<b>STIPULATION AND ORDER RE CASE</b>
	)	<b>SCHEDULING</b>
17 vs.	)	
	)	Complaint Filed: 06/16/17
18 TARGET CORPORATION, TARGET	)	[Napa County Superior Court
19 STORE #1438 and DOES 1 to 40,	)	Case No. 17CV000666]
	)	
20 Defendants.	)	
	)	

21 Pursuant to the Court's MINUTE ENTRY dated November 27, 2017, for proceedings at  
 22 Initial Case Management Conference (Document 23), the parties have engaged in several meet and  
 23 confer discussions to develop the dates set forth in this Stipulation and [Proposed] Order re Case  
 24 Scheduling. These dates have been modified from those originally contemplated by the parties as a  
 25 result of plaintiff LESLIE BROWN undergoing knee replacement surgery on January 31, 2018,  
 26 which counsel for plaintiff and defendant just learned of. As a result of this development, the  
 27 parties anticipate a delay in completion of fact discovery, including the deposition of LESLIE  
 28 BROWN, as well as medical evaluation of LESLIE BROWN by a defense medical expert, due to

1 post surgery recuperation and rehabilitation. The parties estimate plaintiff LESLIE BROWN will  
2 not be able to testify until at least April or May, 2018 and will not be in a position to be  
3 meaningfully evaluated post-surgery until July or August 2018. The dates below reflect this  
4 development.

5 1. CLOSE OF FACT DISCOVERY:	May 31, 2018
6	
7 2. HEARING ON DISPOSITIVE	August 9, 2018 at 2:00 p.m.
8 MOTIONS (if any):	
9 3. ADR: The parties will complete	August 31, 2018
10 private mediation:	
11 4. DESIGNATION OF EXPERTS BY	September 4, 2018
12 PLAINTIFFS:	
13 5. DESIGNATION OF EXPERTS BY	September 18, 2018
14 DEFENDANT:	
15 6. CLOSE OF EXPERT DISCOVERY:	October 9, 2018
16	
17 7. PRETRIAL CONFERENCE:	December 4, 2018 at 3:00 p.m.
18	
19 8. JURY TRIAL (7 days estimated):	January 14, 2019 at 8:30 a.m. (5 days)
20	
21	

22 Respectfully submitted,

23 Dated: February 8, 2018

THE VEEN FIRM

24  
25 */s/ David L. Winnett*

By \_\_\_\_\_

26 David L. Winnett  
27 Attorneys for Plaintiffs  
28 LESLIE AND SHANE BROWN

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Dated: February 8, 2018


LIVINGSTON LAW FIRM

*/s/ Renée Welze Livingston*

By \_\_\_\_\_  
Renée Welze Livingston  
Attorneys for Defendant  
TARGET CORPORATION

**SO ORDERED.**

DATED: February 8, 2018

  
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HON. HAYWOOD S. GILLIAM, JR.  
U.S. DISTRICT COURT JUDGE