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8 Attorneys for Plaintiff  
Ulysses Davis, Jr.  
9

10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12

13 ULYSSES DAVIS, JR., )  
14 Plaintiff, )  
15 v. )  
16 MARIN COUNTY JAIL, et al., )  
17 Defendants. )  
18 )  
19 )  
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CASE NO.: 5:03-cv-04334-RMW  
**JOINT STIPULATION AND  
[XXXXXXXXXXXXX ORDER TO ENLARGE  
TIME FOR DISCOVERY, EXPERT  
DISCLOSURES, DISPOSITIVE  
MOTIONS, AND OTHER RELATED  
DATES**

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1 Pursuant to Civil Local Rule 6-2, Plaintiff Ulysses Davis, Jr. ("Mr. Davis" or "Plaintiff")  
2 and Defendants Marin County Jail, Marin County Sheriff's Department, Marin County Sheriff  
3 Deputy Larry Filipiak, Marin County Sheriff Sergeant Kenneth W. Frey, Marin County Sheriff  
4 Deputy Shay Haynes, Marin County Sheriff Deputy Hank McKenzie, Marin County Sheriff  
5 Sergeant Steve de la O, Marin County Sheriff Deputy Mike O'Neill, Marin County Sheriff  
6 Sergeant Patricia Seyler-Campbell (collectively "Defendants"), hereby stipulate and jointly  
7 request that the Court enlarge the time for discovery, expert disclosures, dispositive motions, and  
8 other related dates. The parties jointly declare the following in support of this request:

9 WHEREAS, on May 13, 2010, this Court entered an Order resetting the trial date to  
10 October 25, 2010;

11 WHEREAS, on May 13, 2010, this Court entered an Order setting a hearing on Plaintiff's  
12 motion to compel on June 15, 2010 – two weeks before the current discovery cut-off and two  
13 weeks after full expert reports are currently due;

14 WHEREAS, the parties have resumed their settlement negotiations in a good faith effort  
15 to resolve the action and anticipate the settlement negotiations to continue through the next few  
16 weeks and at least into June 2010; and;

17 WHEREAS, the parties have met and conferred and agreed, subject to the Court's  
18 approval, that it would be in the best interests of the parties to continue to discuss possible  
19 resolution prior to devoting substantial resources to continue pre-trial discovery, including the  
20 preparation of expert witness reports;

21 THEREFORE, pursuant to Local Rule 6-2, the parties, Mr. Davis, and Defendants, hereto  
22 and through their respective attorneys of record joint stipulate as follows:

23 1. The last date for designation of expert witnesses that may testify at trial and  
24 disclosure of full expert reports shall be June 30, 2010.

25 2. The expert and non-expert discovery cut-off date shall be July 30, 2010.

26 3. The last day for parties to move to compel expert and non-expert discovery shall  
27 be August 6, 2010.

28 4. The hearing on dispositive motions shall be on September 10, 2010.

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5. Dispositive motions shall be filed no later than August 6, 2010.

6. Oppositions to dispositive motions shall be filed no later than August 20, 2010.

7. Reply briefs in support of dispositive motions shall be filed no later than August 27, 2010.

Dated: May 18, 2010

WILSON SONSINI GOODRICH & ROSATI  
Professional Corporation

By: /s/ Lee-Anne Mulholland  
Lee-Anne Mulholland  
lmulholland@wsgr.com

Dated: May 18, 2010

COUNTY COUNSEL OF MARIN COUNTY

By: /s/ Renee Giacomini Brewer  
Renee Giacomini Brewer  
rbrewer@co.marin.ca.us

Attorneys for Defendants  
Marin County Jail, Marin County Sheriff's  
Department, Marin County Sheriff Deputy  
Larry Filipiak, Marin County Sheriff Sergeant  
Kenneth W. Frey, Marin County Sheriff  
Deputy Shay Haynes, Marin County Sheriff  
Deputy Hank McKenzie, Marin County Sheriff  
Sergeant Steve de la O, Marin County Sheriff  
Deputy Mike O'Neill, Marin County Sheriff  
Sergeant Patricia Seyler-Campbell

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|XXXXXXXXXXXX ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: 5/20/10

Ronald M. Whyte

THE HONORABLE RONALD M. WHYTE  
United States District Judge

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**ECF CERTIFICATION**

I, Lee-Anne Mulholland, am the ECF User whose identification and password are being used to file this STIPULATION AND [PROPOSED] ORDER TO ENLARGE TIME FOR DISCOVERY, EXPERT DISCLOSURES, DISPOSITIVE MOTIONS, AND OTHER RELATED DATES. In compliance with General Order 45.X.B, I hereby attest that Renee Giacomini Brewer has concurred in this filing.

Dated: May 18, 2010

WILSON SONSINI GOODRICH & ROSATI  
Professional Corporation

By: /s/ Lee-Anne Mulholland  
LEE-ANNE MULHOLLAND