1	STEPHEN D. SCHEAR State Bar No. 83806		
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5	Attorneys for Plaintiff		
6	TUMEŘA GODWIN		
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9	UNITED STATES DISTRICT COURT		
10	FOR THE NORTHERN	DISTRICT OF CALIFORNIA	
11	TUMEKA GODWIN,)) No. C 02-05631 JSW	
12	Plaintiff,)) STIPULATED REQUEST FOR ORDER	
13	VS.) CHANGING TIME; DECLARATION;) AND PROPOSED ORDER	
14	DEPUTY HUGHES, CITY AND COUNTY OF SAN FRANCISCO, SHERIFF		
15	MICHAEL HENNESEY, and DOES 1 THROUGH 10, INCLUSIVE)	
16	Defendants.)))	
17			
18	STIPULATED REQUEST FOR ORDER CHANGING TIME		
19	Pursuant to the Northern District's Civil Local Rule 6-2, the parties hereby		
20	stipulate and request that the court order extensions of time for all deadlines in the above		
21	case. The reasons for this request are set forth in the declaration of Jana Carter attached		
22	hereto.		
23	The parties stipulate and request the	e court to change time as set forth below:	
24	(1) Current trial date:	July 26, 2004	
25	Modified trial date:	March 14, 2005	
26	(2) Current last day to hear dispositive	e motions: June 18, 2004	
27	Modified date to hear dispositive	e motions: January 28, 2005	
28			
	STIPULATION FOR CHANGING TIME, DECLARATION IN SUPPORT AND PROPOSED ORDER	C 02-05631 JSW	
		Docketa Justia	

1	(3)	Current discovery closure:	April 3, 2004
2		Modified date for discovery closure:	December 3, 2004
3	(4)	Current ENE deadline:	February 17, 2004
4		Modified ENE deadline:	May 3, 2004
5			
6	IT IS	SO STIPULATED.	
7		Dated: March 2, 2004	/s/
8		Dated. March 2, 2004	Jana Carter
9			Attorney for Plaintiff Tumeka Godwin
10		Dated: March 4, 2004	/s/ Evan Ackiron
11			Deputy City Attorney Attorney for Defendants San Francisco and Sheriff Hennessey
12			and Sheriff Hennessey
13	IT IS	SO ORDERED.	
14		Dated:	
15			The Honorable Jeffrey S. White UNITED STATES DISTRICT JUDGE
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DECLARATION IN SUPPORT OF STIPULATED REQUEST FOR ORDER CHANGING TIME PURSUANT TO CIVIL LOCAL RULE 6-2(a)

I, Jana Carter, declare as follows:

I am an attorney duly licensed to practice law in this Court and I represent the
 plaintiff, Tumeka Godwin, in this lawsuit. If called to testify, I would and could testify
 competently to the matters set forth below.

7 2. I plan to be on maternity leave from June 21, 2004 through September 24, 2004,
although I may be able to work part-time during the latter part of that time. However, the
9 earlier part of my maternity leave overlaps several of the deadlines in this case, including
10 the current trial date and the last day to hear dispositive motions. As a result, the parties
11 have agreed to extensions of time on the trial date until March 14, 2005 and the last
12 day to hear dispositive motions until January 28, 2005.

The ENE, originally scheduled for August 2003 has not yet taken place. A new
 ENE evaluator has been assigned and after conferring with the parties, requested that the
 parties seek a continuance of the ENE deadline until at least April 16, 2004. The parties
 have agreed to conduct additional discovery before the ENE, which is currently
 scheduled for April 16, 2003. Thus, the parties seek to have the ENE deadline extended

18 to May 3, 2004.

19 4. The parties are currently conducting discovery. The parties request that the
20 discovery deadline be extended until December 3, 2004, to allow for the completion of
21 discovery, given my scheduled maternity leave.

S. No previous time extensions have been requested, with the exception of severalextensions of the ENE deadline.

24 6. The effect the proposed time modifications will have on the schedule for the case25 will be a delay of approximately eight months.

26 DATED: March 2, 2004

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/<u>s/</u> Jana Carter CARTER & SCHEAR Attorney for Plaintiff Tumeka Godwin