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5 Attorney for Plaintiff
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8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA
 10 SAN JOSE DIVISION

10 RAMON OBAS,
 11
 12 Plaintiff,
 13 v.
 14 COUNTY OF MONTEREY; CONAN
 HICKEY; BRYAN HOSKINS; and DOES 1-
 15 50, inclusive.
 16 Defendants.

CASE NO.: C09-5540-LHK

**STIPULATION AND [PROPOSED]
 ORDER CONTINUING FACT AND
 EXPERT DISCOVERY CUT-OFF**

Action filed: November 23, 2009
 Trial date: July 18, 2011

STIPULATION

18 Plaintiff RAMON OBAS, through counsel, and Defendants COUNTY OF MONTEREY,
 19 CONAN HICKEY, and BRYAN HOSKINS, (hereafter collectively referred to as the "Parties")
 20 hereby stipulate and agree as follows:

- 21 1. Trial of this case is set for July 18, 2011. Fact discovery is currently scheduled to
 22 close on January 28, 2011 and expert discovery is scheduled to close on March 25, 2011.
- 23 2. The hearing for Defendants' motion for summary judgment was continued by order of
 24 this Court, pursuant to stipulation, from December 9, 2010 to January 27, 2011. The Parties
 25 believe that the discovery deadline should be extended due to the fact that the summary
 26 judgment motion may reveal information upon which both Parties may wish to follow up with
 27 discovery and also due to the fact that the current discovery deadlines are far in advance of the
 28 trial date.

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3. The Parties believe that continuing the fact discovery deadline from January 28, 2011 to March 18, 2011, and continuing the expert discovery deadline from March 25, 2011 to April 22, 2011, would be appropriate and hereby jointly and respectfully request an order so continuing said deadlines.

So stipulated.

Dated: December 13, 2010

LAW OFFICE OF JOSEPH S. MAY

/s/ Joseph S. May

JOSEPH S. MAY, Attorney for Plaintiff,
RAMON OBAS

So stipulated.

Dated: December 13, 2010

OFFICE OF THE COUNTY COUNSEL,
COUNTY OF MONTEREY

*/s/ William M. Litt**

By: WILLIAM M. LITT, Attorney for Defendants
COUNTY OF MONTEREY, CONAN HICKEY
AND BRYAN HOSKINS

*Pursuant to General Order 45, §X.B., the filer of this document attests that he has received the concurrence of this signatory to file this document.

[PROPOSED] ORDER

Pursuant to the Stipulation of the Parties, the close of fact discovery is hereby continued to March 18, 2011 and the close of expert discovery is hereby continued to April 22, 2011.

SO ORDERED.

Date: December 27, 2010



LUCY H. KOH
United States District Judge