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16 Attorneys for Defendants
 C. WILLIAMS AND M. SAYRE

18 UNITED STATES DISTRICT COURT
 19 NORTHERN DISTRICT OF CALIFORNIA

21 FRANCISCO J. MEDINA,
 22 Plaintiff,
 23 v.
 24 DR. CLAIRE WILLIAMS, et. al.,
 25 Defendants.

CASE NO. C 10-03610 RMW
**STIPULATION AND ~~PROPOSED~~ ORDER
 TO EXTEND CASE MANAGEMENT
 DEADLINES**

Trial Date: June 30, 2014
 Judge: Honorable Ronald M. Whyte

1 **WHEREAS**, on January 25, 2013, the Court held an initial Federal Rule of Civil
2 Procedure Rule 26(f) Case Management Conference;

3 **WHEREAS**, on March 18, 2013, the Court issued a Case Management Scheduling
4 Order, in which it set forth deadlines with respect to discovery, dispositive motions, pretrial
5 conference, and trial;

6 **WHEREAS**, that Order directed the parties to exchange initial disclosures pursuant to
7 Federal Rule of Civil Procedure 26 on or before 14 days after the Court issued an order regarding
8 the status of Defendant Sayre as a party to this suit;

9 **WHEREAS**, on July 29, 2013, the Court vacated and modified the dates ordered in its
10 Case Management Scheduling Order pursuant to the parties' stipulation and in light of the fact
11 that the status of Defendant Sayre remained undetermined, setting the cut-off date of fact
12 discovery at November 22, 2013;

13 **WHEREAS**, on September 30, 2013, the Court issued an Order Granting Defendants'
14 Motion for Summary Judgment as to Defendant Sayre, which effectively lifted the stay of
15 discovery;

16 **WHEREAS**, the deadlines with respect to discovery, dispositive motions, pretrial
17 conference, and trial set forth in the Court's July 29, 2013 Order are no longer feasible in light of
18 the time available to the parties to conduct discovery, and;

19 **WHEREAS**, it is reasonable and appropriate under the circumstances to extend by
20 approximately 120 days the trial date and all related discovery deadlines in this matter.

21 **THEREFORE, IT IS HEREBY STIPULATED** by and between the parties through
22 their respective attorneys of record that good cause exists to vacate the dates ordered in the July
23 29, 2013 Order and to set the following dates, subject to the Court's availability:

- 24 • Exchange of Initial Disclosures: November 5, 2013;
- 25 • Fact Discovery Cut-Off: March 21, 2014;
- 26 • Expert Witness Disclosure and Reports: May 9, 2014;
- 27 • Rebuttal Expert Reports: June 9, 2014;
- 28 • Expert Discovery Cut-Off: July 14, 2014;

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- Last Date to Hear Dispositive Motions: September 25, 2014;
- Trial Date: October 27, 2014.

Good cause exists for the modification to the schedule because the parties cannot complete discovery before the current discovery cut-off.

It is so stipulated.

Dated: October 1, 2013

Respectfully submitted,

LATHAM & WATKINS LLP
 Timothy P. Crudo
 Evangeline A.Z. Burbidge
 Christina E. Namikas

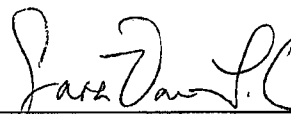


Evangeline A.Z. Burbidge
 Attorneys for Plaintiff
 FRANCISCO J. MEDINA

Dated: October 1, 2013

Respectfully submitted,

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~~PROPOSED~~ ORDER

Pursuant to stipulation, and good cause existing therefore, it is ordered that the dates ordered in the July 29, 2013 Order are hereby VACATED in lieu of the following dates:

- Exchange of Initial Disclosures: November 5, 2013
- Fact Discovery Cut-Off: March 21, 2014;
- Expert Witness Disclosure and Reports: May 9, 2014;
- Rebuttal Expert Reports: June 9, 2014;
- Expert Discovery Cut-Off: July 14, 2014;
- Last Date to Hear Dispositive Motions: September 25, 2014;
- Trial Date: October 27, 2014.

IT IS SO ORDERED.

Dated: _____

Ronald M. Whyte
 Hon. Ronald M. Whyte
 United States District Court Judge

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