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C. WILLIAMS

17 UNITED STATES DISTRICT COURT
18 NORTHERN DISTRICT OF CALIFORNIA

19
20 FRANCISCO J. MEDINA,
21 Plaintiff,
22 v.
23 DR. CLAIRE WILLIAMS,
24 Defendants.

CASE NO. C 10-03610 RMW

STIPULATION AND ~~PROPOSED~~ ORDER
TO EXTEND CASE MANAGEMENT
DEADLINES

Trial Date: March 30, 2015
Judge: Honorable Ronald M. Whyte

1 **WHEREAS**, the current fact discovery deadline is August 22, 2014;

2 **WHEREAS**, the parties have been engaged in mediation with Magistrate Judge Vadas
3 since June 14, 2013;

4 **WHEREAS**, a dispute has arisen between the parties in connection with mediation as to
5 whether the case has settled;

6 **WHEREAS**, the parties believe that further negotiation and mediation may lead to an
7 informal resolution of the dispute and potentially a final resolution of this case;

8 **WHEREAS**, the parties believe that extending the existing discovery deadline is
9 necessary to avoid unnecessary and distracting effort that may impede mediation efforts;

10 **WHEREAS**, moving the existing discovery deadline would impact the rest of the case
11 schedule requiring extension of other pretrial dates;

12 **WHEREAS**, the parties agree that this stipulation is designed to allow the parties
13 additional time to negotiate and mediate, and both parties agree that this stipulation does not
14 constitute a waiver of any argument regarding the underlying dispute.

15 **THEREFORE, IT IS HEREBY STIPULATED** by and between the parties through
16 their respective attorneys of record that good cause exists to set the following dates, subject to
17 the Court's availability:

- 18 • Fact Discovery Cut-Off: November 20, 2014;
- 19 • Expert Witness Disclosure and Reports: January 8, 2015;
- 20 • Rebuttal Expert Reports: February 9, 2015;
- 21 • Expert Discovery Cut-Off: March 16, 2015;
- 22 • Dispositive Motions Due: April 17, 2015;
- 23 • Dispositive Motion Hearing Cut-Off: May 22, 2015;
- 24 • Pretrial Conference: June 18, 2015;
- 25 • Trial Date: June 29, 2015.

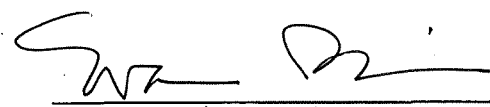
26 Good cause exists for the modification to the schedule because the current discovery
27 cutoff is too near in time to permit adequate time for the parties' informal negotiation toward a
28 resolution of this case.

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It is so stipulated.

Dated: July 22, 2014

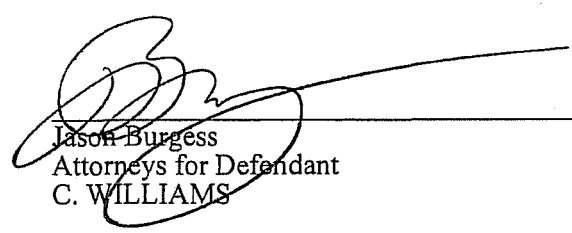
Respectfully submitted,
LATHAM & WATKINS LLP



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

Dated: July 22, 2014

Respectfully submitted,
KAMALA D. HARRIS
Attorney General of California



Jason Burgess
Attorneys for Defendant
C. WILLIAMS

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~~PROPOSED~~ ORDER

Pursuant to stipulation, and good cause existing therefore, it is ordered that the following dates are effective:

- Fact Discovery Cut-Off: November 20, 2014;
- Expert Witness Disclosure and Reports: January 8, 2015;
- Rebuttal Expert Reports: February 9, 2015;
- Expert Discovery Cut-Off: March 16, 2015;
- Dispositive Motions Due: April 17, 2015;
- Dispositive Motion Hearing Cut-Off: May 22, 2015;
- Pretrial Conference: June 18, 2015;
- Trial Date: June 29, 2015.

IT IS SO ORDERED.

Dated: _____

Ronald M. Whyte

Hon. Ronald M. Whyte