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14 Attorneys for Defendants
 C. WILLIAMS

16 UNITED STATES DISTRICT COURT
 17 NORTHERN DISTRICT OF CALIFORNIA
 18 SAN JOSE DIVISION

19 FRANCISCO J. MEDINA,
 20 Plaintiff,

21 v.

22 DR. CLAIRE WILLIAMS,
 23 Defendants.

CASE NO. C 10-03610 RMW

**STIPULATION AND J ORDER
 TO EXTEND CASE MANAGEMENT
 DEADLINES**

Trial Date: June 29, 2015
 Judge: Honorable Ronald M. Whyte

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1 **WHEREAS**, the parties were engaged in mediation with Magistrate Judge Vadas since
2 June 14, 2013;

3 **WHEREAS**, a dispute arose between the parties following a settlement agreement
4 entered into in February 2014, which the parties have resolved through further informal
5 negotiation and mediation before Magistrate Judge Vadas;

6 **WHEREAS**, the parties informally agreed to suspend fact discovery during the period of
7 active negotiation so as to avoid the unnecessary expenditure of time and cost;

8 **WHEREAS**, the parties entered into a settlement agreement in November 2014, which
9 was transmitted by counsel for Defendant on December 3, 2014 to the California Department of
10 Corrections and Rehabilitation (“CDCR”);

11 **WHEREAS**, CDCR processes settlement payments within 180 days;

12 **WHEREAS**, the parties believe that extending the existing case management deadlines
13 by 180 days from December 3, 2014 is reasonable and necessary to permit the processing of the
14 settlement payment by CDCR to Plaintiff Francisco J. Medina;

15 **WHEREAS**, the parties agree that this stipulation is designed to allow the parties
16 additional time for the processing of the settlement payment while reserving their rights with
17 respect to the underlying action.

18 **THEREFORE, IT IS HEREBY STIPULATED** by and between the parties through
19 their respective attorneys of record that good cause exists to set the following dates, subject to
20 the Court’s availability:

- 21 • Fact Discovery Cut-Off: June 1, 2015;
- 22 • Expert Witness Disclosure and Reports: July 7, 2015;
- 23 • Rebuttal Expert Reports: August 10, 2015;
- 24 • Expert Discovery Cut-Off: September 12, 2015;
- 25 • Dispositive Motions Due: October 14, 2015;
- 26 • Dispositive Motion Hearing Cut-Off: November 18, 2015;
- 27 • Pretrial Conference: December 15, 2015;
- 28 • Trial Date: December 28, 2015.

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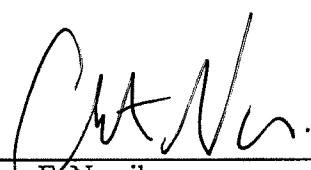
Good cause exists for the modification to the schedule because the current discovery cutoff is too near in time to permit adequate time for the parties' informal negotiation toward a resolution of this case.

It is so stipulated.

Dated: February 11, 2015

Respectfully submitted,

LATHAM & WATKINS LLP

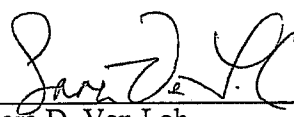


Christina E. Namikas
Attorneys for Plaintiff
FRANCISCO J. MEDINA

Dated: February 10, 2015

Respectfully submitted,

KAMALA D. HARRIS
Attorney General of California



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C. WILLIAMS

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ORDER

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

- Fact Discovery Cut-Off: June 1, 2015;
- Expert Witness Disclosure and Reports: July 7, 2015;
- Rebuttal Expert Reports: August 10, 2015;
- Expert Discovery Cut-Off: September 12, 2015;
- Dispositive Motions Due: October 14, 2015;
- Dispositive Motion Hearing Cut-Off: November 18, 2015;
- Pretrial Conference: December 15, 2015;
- Trial Date: December 28, 2015.

IT IS SO ORDERED.

Dated: _____



 Hon. Ronald M. Whyte