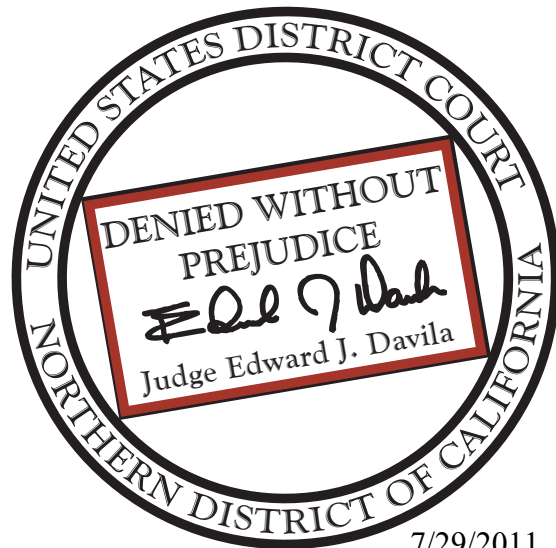


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8 Attorneys for Defendants THE ESTATE OF DONALD T. HEIM
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9

7/29/2011

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA

12 MARK HEIM

Plaintiff,

13 vs.

14 THE ESTATE OF DONALD T. HEIM,
15 MAXINE HEIM, AND CITY OF
16 WATSONVILLE,

Defendants.

Case No. 5:10-CV-03816 EJD

**STIPULATION AND [PROPOSED]
ORDER EXTENDING PRE-TRIAL
DEADLINES**

17 _____
18 And Related Counter-Claims and Third-Party
19 Claims.

20
21 IT IS HEREBY STIPULATED by and between the existing parties to this case, Plaintiff
22 Mark Heim, Defendant Maxine Heim, Defendant City of Watsonville, and Defendants
23 Multimatic Corporation, Multimatic LLC and the Kirrberg Corporation that Mark Heim, Maxine
24 Heim, and the City of Watsonville (collectively the "Parties"), that the current pre-trial deadlines
25 be extended. Good cause exists in extending said deadlines because Plaintiff, the City of
26 Watsonville and Maxine Heim have each recently filed an amended pleading and are currently
27 effecting service on newly added parties. Further, discovery and depositions will need to be
28 conducted as to these newly added entities. The Parties propose that the pre-trial deadlines be

1 extended as follows:

- 2 • Close of all discovery (fact and expert) December 18, 2012
- 3 • Preliminary Pre-trial Conference November 19, 2012
- 4 • Preliminary Pre-trial Statement November 5, 2012

5

6 Dated: July 27, 2011

LAW OFFICES OF MARTIN DEUTSCH

7

/s/ Martin Deutsch

8

MARTIN DEUTSCH

9

SOSAN AKBAR

Attorneys for Plaintiff and Counter Defendant

10

MARK HEIM

11

Dated: July 27, 2011

GREBEN & ASSOCIATES

12

/s/ Jan Greben

13

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DANIELLE DE SMETH

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15

Defendant, Counter Complainant, Cross

Complainant and Third Party Plaintiff Maxine Heim

16

Dated: July 27, 2011

WACTOR & WICK LLP

17

/s/ William Wick

18

WILLIAM D. WICK

Attorneys for Defendant, Counter-Complainant,

19

and Cross-Complainant

THE CITY OF WATSONVILLE

20

Dated: July 27, 2011

DONGELL LAWRENCE FINNEY

21

22

/s/ Thomas Vandenburg

23

THOMAS VANDENBURG

IAN CULVER

24

Attorneys for Third Party Defendants

MULTIMATIC CORPORATION, MULTIMATIC

LLC and THE KIRRBURG CORPORATION

25

IT IS SO ORDERED.

26

The Court denies the parties' request for extension of time due to the lack of adequate information as to the need for the extension of time. The Court sets a Case Management

27

Conference on **September 30, 2011 at 10:00 AM** to discuss the need for a new case schedule.

28

On or before **September 23, 2011**, the parties shall file a joint case management conference statement that updates the Court as to how this case should proceed.

Dated: July 29, 2011



Edward J. Davila

United States District Judge