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8 Attorneys for Defendants
9 COUNTY OF SANTA CRUZ and
10 SHERIFF PHIL WOWAK

11 UNITED STATES DISTRICT COURT

12 NORTHERN DISTRICT OF CALIFORNIA – SAN JOSE

13 ESTATE OF BRADLEY G. DREHER by)
14 JEAN BERNARD, the administrator of his)
15 estate, and CAROL E. MCGUIRE,)
16 individually,)

17 Plaintiff,

18 vs.

19 COUNTY OF SANTA CRUZ, PHIL)
20 WOWAK, SHERIFF OF COUNTY OF)
21 SANTA CRUZ, and DOES 1-300, inclusive,)

22 Defendants.)

Case No.: C13-02482 EJD (MEJ)

**STIPULATION AND ~~PROPOSED~~
ORDER RESCHEDULING
MANDATORY SETTLEMENT
CONFERENCE AND EXTENDING CASE
SCHEDULE**

23 The parties hereto, by and through their undersigned counsel, stipulate and agree as
24 follows:

25 1. The parties are currently scheduled to appear for a settlement conference with
26 Magistrate Judge Maria Elena James on December 17, 2014. However, the claims
27 representative for the County of Santa Cruz has had an unresolvable conflict arise on that date,
28 in that he is required to appear at an all-day mediation in another large, multi-party case.

2. The parties have met and conferred on this issue, and have agreed to request a
continuance of the settlement conference in this matter in light of the aforementioned conflict.
Judge James' calendar clerk is holding the date of February 6, 2015 for the parties, pending
approval of this stipulation. This date is the first available date on Judge James' calendar, and it
has been pre-cleared by the undersigned counsel as well as their respective clients and client

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1 representatives.

2 3. The parties also request that the current case schedule (Docket #50) be extended
3 by 60 days. The reason for the requested extension is to allow the parties to preserve resources
4 prior to the settlement conference, but still allow some time to conduct additional discovery to
5 prepare for dispositive motions and trial in the event the case does not settle. This is the parties'
6 second request for an extension of the case schedule. The new proposed schedule is set forth in
7 the order below.

8 IT IS SO STIPULATED.

9 Dated: December 2, 2014

LAW OFFICES OF RALPH W. BOROFF, P.C.

11 By: */s/ Ralph W. Boroff
12 Ralph W. Boroff
13 Attorneys for Plaintiff
14 *Mr. Boroff provided his consent that this
document be electronically filed

15 Dated: December 2, 2014

HAAPALA, THOMPSON & ABERN, LLP

16 By: /s/ Rebecca S. Widen
17 Rebecca S. Widen
18 Attorneys for Defendants COUNTY OF
ALAMEDA and SHERIFF WOWAK

19
20 Dated: December 2, 2014

By: */s/ Jerome M. Varanini
Jerome M. Varanini
Attorneys for Defendant CFMG
*Mr. Varanini provided his consent that this
document be electronically filed

23 **ORDER**

24 The Court having considered the parties' stipulation, and good cause appearing, IT IS
25 HEREBY ORDERED that the parties' settlement conference with Magistrate Judge Maria
26 Elena James be rescheduled to February 6, 2015, at 10:00 a.m.

27 IT IS FURTHER ORDERED that the current case schedule be extended 60 days. The
28 new case schedule shall be as follows:

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| EVENT | DEADLINE |
|--|------------------------------|
| Fact Discovery Cutoff | April 30, 2015 |
| Designation of Opening Experts with Reports | June 15, 2015 |
| Designation of Rebuttal Experts with Reports | June 30, 2015 |
| Expert Discovery Cutoff | August 14, 2015 |
| Deadline(s) for Filing Discovery Motions | See Civil Local Rule 37-3 |
| Deadline for Filing Dispositive Motions | September 30, 2015 |
| Preliminary Pretrial Conference | 11:00 a.m., on June 18, 2015 |

Dated: 12/3/2014



Edward J. Davila
U.S. District Court Judge