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7 Attorneys for Defendant  
 8 GEORGE L. MEE MEMORIAL HOSPITAL  
 9 aka MEE MEMORIAL HOSPITAL

10 UNITED STATES DISTRICT COURT  
 11 NORTHERN DISTRICT OF CALIFORNIA  
 12 SAN JOSE DIVISION

13 DAVID G. CONTRERAS  
 14 Plaintiff,  
 15 v.  
 16 GEORGE L. MEE MEMORIAL  
 17 HOSPITAL aka MEE MEMORIAL  
 18 HOSPITAL, a California Non-Profit  
 19 Entity, and DOES 1-10,  
 20 Defendants.

CASE NO.: 5:15-CV-03963-BLF  
**STIPULATION RE [PROPOSED]  
 DISCOVERY SCHEDULE AND  
 DEADLINES TO TRIAL**  
 Date of Filing: August 31, 2015  
 Trial Date: September 11, 2017

20 Pursuant to the Court's December 10, 2015 Case Management Order, the parties have  
 21 met and conferred and file this Stipulation Re [Proposed] discovery schedule and deadlines to  
 22 trial:

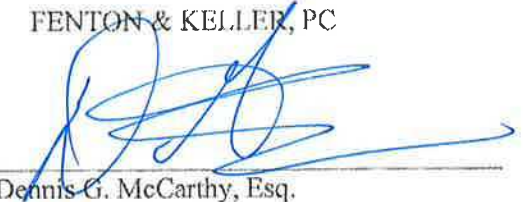
<u>DESCRIPTION</u>	<u>DATE / DEADLINE</u>
Last day to amend pleadings or add parties:	December 30, 2016
Fact discovery cutoff	March 31, 2017
Last day to disclose expert witnesses:	June 1, 2017
Expert discovery cutoff	July 28, 2017

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 {DGM-525262;1}

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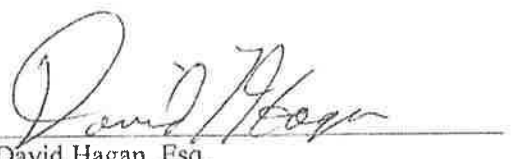
Dated: January 12, 2016

FENTON & KELLER, PC

By: 

Dennis G. McCarthy, Esq.  
Derric G. Oliver, Esq.  
Attorneys for Defendant  
GEORGE L. MEE MEMORIAL HOSPITAL  
aka MEE MEMORIAL HOSPITAL

Dated: January 12, 2016

By: 

David Hagan, Esq.  
Attorneys for Plaintiff DAVID CONTRERAS