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7 Attorneys for Defendants
CITY AND COUNTY OF SAN FRANCISCO,
8 THE MAYOR OF SAN FRANCISCO and
THE CHIEF OF THE SAN FRANCISCO POLICE DEPARTMENT
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11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
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14 ESPANOLA JACKSON, PAUL COLVIN,
THOMAS BOYER, LARRY BARSETTI,
15 DAVID GOLDEN, NOEMI MARGARET
ROBINSON, NATIONAL RIFLE
16 ASSOCIATION OF AMERICA, INC., and
SAN FRANCISCO VETERAN POLICE
17 OFFICERS ASSOCIATION,

18 Plaintiffs,

19 vs.

20 CITY AND COUNTY OF SAN
FRANCISCO, THE MAYOR OF SAN
21 FRANCISCO, and THE CHIEF OF THE SAN
FRANCISCO POLICE DEPARTMENT, in
22 their official capacities,

23 Defendants.
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Case No. C09-2143 RS

**STIPULATION AND [PROPOSED] ORDER
EXTENDING PRETRIAL AND TRIAL
DEADLINES AND ADVANCING FURTHER
CASE MANAGEMENT CONFERENCE**

[Local Rule 6-2]

1 WHEREAS, Plaintiffs have filed a motion for partial judgment on the pleadings ("Motion"),
2 Doc. 109, and that Motion is set to be heard on July 12, 2012, at 1:30 p.m.;

3 WHEREAS, the Parties presently dispute whether there are any factual matters relevant to the
4 disposition of this case, and whether party depositions should occur and what the permissible scope of
5 any depositions should be;

6 WHEREAS, the Court's resolution of the Motion is likely to provide the Parties with guidance
7 concerning whether there are factual issues that must be resolved for this case to be resolved on its
8 merits;

9 WHEREAS, in the interests of conserving resources that would otherwise be spent taking party
10 discovery or resolving discovery disputes while the Motion is pending, the Parties have agreed to
11 extend the discovery deadlines, and all corresponding deadlines including the pretrial and trial
12 deadlines, in this case by eight weeks, subject to the Court's approval and to the Court's calendar, but
13 in the event the Motion is not resolved until later the Parties wish to continue to table these party
14 discovery disputes and discovery deadlines until the Motion is resolved;

15 WHEREAS, in the event the Court approves this Stipulation and Order, the parties will table
16 all deposition efforts and discovery motions until the Court resolves this Motion; and

17 WHEREAS, the Parties believe it would be beneficial to advance the next Case Management
18 Conference in this case, currently set for August 23, 2012 at 10:30 a.m., to July 12, 2012, at 1:30 p.m.,
19 the date of the hearing on the Motion, or such time that is convenient for the Court, so that the Parties
20 can discuss these scheduling and discovery issues with the Court.

21 Pursuant to Local Civil Rule 6-2, the parties stipulate and seek an order of the Court as
22 follows:

23 The pretrial and trial deadlines for this case shall be modified as set forth herein. All dates not
24 modified by this stipulation and order remain as previously set by the Court.

25 July 5, 2012 Joint Case Management Conference Statement due

26 July 12, 2012 at 1:30 p.m. Further Case Management Conference

27 October 10, 2012 Fact discovery closes

28 October 29, 2012 Plaintiffs' expert disclosures due

1	November 12, 2012	Defendants' expert disclosures due
2	November 28, 2012	Expert discovery closes
3	February 7, 2013	Deadline for hearing on dispositive motions
4	April 11, 2013	Final pretrial conference
5	April 22, 2013	Trial

6
7 IT IS SO STIPULATED.

9	Dated: June 6, 2012	By: <u>**s/Clinton B. Monfort</u>
10		Clinton B. Monfort
11		Attorneys for Plaintiffs

13	Dated: June 6, 2012	By: <u>s/Christine Van Aken</u>
14		Christine Van Aken
15		Attorney for Defendants

16 **Pursuant to GO 45, the electronic signatory has
17 obtained approval from this signatory.

18
19 **[PROPOSED] ORDER**

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21 PURSUANT TO STIPULATION, IT IS SO ORDERED.

23	DATED: _____	_____
24		HON. RICHARD SEEBORG
25		UNITED STATES DISTRICT JUDGE