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11 12 13	UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA	
14	SAN FRANCISCO DIVISION	
15	ROBERT JACOBSEN, an individual,	Case Number C06-1905-JSW
16	Plaintiff,	Hon. Jeffrey S. White
17	vs.	
18 19 20	MATTHEW KATZER, an individual, KAMIND ASSOCIATES, INC., an Oregon corporation dba KAM Industries, and KEVIN RUSSELL, an	STIPULATED ADMINISTRATIVE MOTION TO EXTEND PRETRIAL SCHEDULE
21	individual,	
22	Defendants.	
23		
24		
25		

Case Number C 06 1905 JSW Stipulated Administrate Motions re dates

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Pursuant to Local Civ. R. 7-12, the parties file this stipulated administrative motion to alter only the existing pretrial litigation schedule as it relates to expert witness discovery. This Court's order [Dkt.#302], sets the following schedule:

Last Day for Expert Disclosure:

10/20/2009

Last Day for Expert Discovery:

11/4/2009

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Good cause exists to alter this expert discovery schedule because the existing schedule does not contemplate or provide enough time for expert rebuttal discovery which is anticipated in this case. Expert reports were timely submitted in this case on 10/20/2009. Pursuant to Fed. R. Civ. P. 26(a)(2)(C)(ii), the parties have 30 days from this date to submit rebuttal expert reports. Therefore, the parties propose the following alteration to the expert discovery schedule:

Last Day for Rebuttal Expert Disclosure: 11/20/2009

Close of Expert Discovery for Defendants: 11/20/2009

Close of Expert Discovery for Plaintiffs: 12/18/2009

The staggered schedule reflects the fact that Defendants did not submit expert reports for their case-in-chief while Plaintiff did. Defendants do intend on providing a rebuttal expert report. All other pretrial and trial dates (including but not limited to the dispositive motion deadlines) shall remain the same as in the existing pretrial order [Dkt.#302].

Dated: October 22, 2009.

Case Number C 06 1905 JSW Stipulated Administrate Motions re dates

1 Respectfully submitted, 2 3 /s/ Scott Jerger 4 R. Scott Jerger (pro hac vice) 5 Field Jerger LLP 610 SW Alder Street, Suite 910 6 Portland, OR 97205 Tel: (503) 228-9115 7 Fax: (503) 225-0276 8 Email: scott@fieldjerger.com 9 /s/ Victoria Hall_ Victoria K. Hall 10 Attorney for Robert Jacobsen Law Office of Victoria K. Hall 11 3 Bethesda Metro Suite 700 12 Bethesda, MD 20814 13 _/s/ David McGowan_ Warren Hall 14 5998 Alcala Park 15 San Diego, CA 92110 16 17 18 19 20 21 22 23 24 25 26