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9 Attorneys for Plaintiffs
MARC HEADLEY and CLAIRE HEADLEY

11 UNITED STATES DISTRICT COURT
12 CENTRAL DISTRICT OF CALIFORNIA

14 MARC HEADLEY,
15 Plaintiffs,
16 vs.
17 CHURCH OF SCIENTOLOGY
INTERNATIONAL, a corporate entity,
18 Defendants.

CASE NO. CV09-3986 DSF (MANx)

19 _____
20 CLAIRE HEADLEY,
21 Plaintiff,
22 vs.
23 CHURCH OF SCIENTOLOGY
INTERNATIONAL, a corporate entity,
24 RELIGIOUS TECHNOLOGY
CENTER, a corporate entity AND
25 DOES 1-20,
26 Defendants.

CV09-3987 DSF (MANx)

STIPULATION OF COUNSEL RE
PLAINTIFFS' *EX PARTE*
APPLICATION FOR A
CONTINUANCE OF DISCOVERY
CUTOFF DATE

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1 IT IS HEREBY STIPULATED by and between Plaintiffs, Marc Headley
2 and Claire Headley, and Defendants, Church of Scientology International and Religious
3 Technology Center, by and through their respective attorneys of record, that the current
4 trial date, associated pre-trial dates, and the discovery cutoff date, be continued by
5 approximately sixty days or as soon thereafter as the Court is available, on the
6 following terms and conditions:

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1. There will be no further written discovery served.
2. No additional depositions will be noticed other than depositions which could properly be noticed to occur before the existing April 12, 2010, discovery cutoff date.
3. All currently noticed depositions will be taken off calendar subject to being reset, with the exception of the depositions of law enforcement officers scheduled to occur in Hemet, California, for the later part of the week of March 22, 2010.
4. A deposition and a subpoena was served on a witness, Michael Norton, in Arizona. Mr. Norton is represented by his own counsel. If counsel for Mr. Norton will agree to a new date for the deposition of Mr. Norton without the need to reserve the subpoena, the deposition of Michael Norton shall be continued to a further date. If counsel for Mr. Norton will not agree to such stipulation, Plaintiffs will seek an order from this Court to enforce the subpoena so that the deposition may be taken at a later mutually convenient date.
5. In light of the Stipulation re Continuance, Plaintiffs will withdraw their pending *Ex Parte* Application to shorten time regarding Plaintiffs' Motion to Compel the Deposition of David Miscavige and Motion to Compel Production of Documents, so that these Motions can be heard on normal notice. Plaintiffs provided notice to the Court on March 22, 2010, at approximately 3:51 p.m., that Plaintiffs were withdrawing the *Ex Parte* Application to shorten time to hear the

1 Motion to Compel the Deposition of David Miscavige and the Motion to Compel
2 Production of Documents.

3 6. The parties agree to the revised dates set forth below and
4 respectfully request that the Court adopt these revised dates, or provide alternative dates
5 as soon thereafter as the Court is available:

6 **CURRENT DATES AND DEADLINES**

7	Trial Date	November 16, 2010
8	Final Pre-trial Conference	October 18, 2010
9	Motion Hearing Cutoff	August 9, 2010
10	Settlement Conference Cutoff	August 23, 2010
11	Discovery Cutoff	March 1, 2010
12	Expert Witness Exchange	Initial: April 12, 2010
13	Deadline	Rebuttal: May 11, 2010
		Cutoff: June 15, 2010

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15 **NEW DATES AND DEADLINES REQUESTED**

16	Trial Date	January 18, 2011
17	Final Pre-trial Conference	December 17, 2010
18	Motion Hearing Cutoff	October 8, 2010
19	Settlement Conference Cutoff	October 22, 2010
20	Discovery Cutoff	June 30, 2010
21	Expert Witness Exchange	Initial: June 30, 2010
22	Deadline	Rebuttal: July 30, 2010
		Cutoff: September 3, 2010

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24 DATED: March 24, 2010

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A Professional Law Corporation

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28 RAPHAEEL METZGER, ESQ.
Attorneys for Plaintiffs
MARC HEADLEY and CLAIRE HEADLEY

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DATED: 3/24/10

PROSKAUER ROSE LLP



HAROLD M. BRODY, ESQ.
Attorneys for Defendant
CHURCH OF SCIENTOLOGY
INTERNATIONAL

DATED:

JEFFER, MANGELS, BUTLER & MARMARO

MARC MARMARO, ESQ.
Attorneys for Defendant
RELIGIOUS TECHNOLOGY CENTER

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DATED: PROSKAUER ROSE LLP

HAROLD M. BRODY, ESQ.
Attorneys for Defendant
CHURCH OF SCIENTOLOGY
INTERNATIONAL

DATED: *March 24, 2010* JEFFER, MANGELS, BUTLER & MARMARO

Marc Marmaro
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RELIGIOUS TECHNOLOGY CENTER