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MODESTO and OFFICER RON ZIYA

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8 UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA

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11 BRIAN REED, B.R., a minor, by her
guardian ad litem, Roxanne Sayer,

12 Plaintiffs,

13 v.

14 CITY OF MODESTO, a municipal
15 corporation, Chief of Police
HARDEN, in his individual capacity;
16 Police Officer RON ZIYA, Police
Officer CAELI KOEHLER, in their
17 individual and official capacities,

18 Defendants.

Case No. 1:11-cv-01083-AWI-GSA

**STIPULATION AND ORDER TO
CONTINUE BRIEFING AND
HEARING DATES OF MOTIONS IN
LIMINE**

CURRENT DATES:

L/D to file MILs: March 11, 2015
L/D to file Opps: March 25, 2015
L/D to file Replies: April 2, 2015
Hearing Date: April 13, 2015, 1:30 p.m.

PROPOSED DATES:

L/D to file MILs: April 8, 2015
L/D to file Opps: April 13, 2015
L/D to file Replies: April 15, 2015
Hearing Date: April 20, 2015, 1:30 p.m.

Hon. Anthony W. Ishii

Trial: April 28, 2015

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24 Plaintiffs BRIAN REED and B.R., through her guardian ad litem, Roxanne
25 Sayers, (hereinafter "Plaintiffs") and Defendants CITY OF MODESTO and
26 OFFICER RON ZIYA (hereinafter "Defendants"), through their counsel of record,
27 hereby stipulate and agree as follows:
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1 1. On February 10, 2015, the Court issued an Order [Docket No. 120]
2 setting the following dates:

- 3 • Trial: April 28, 2015, 8:30 a.m., in Courtroom 2
- 4 • Any additional motions in limine: March 11, 2015
- 5 • Any opposition: March 25, 2015
- 6 • Any reply: April 2, 2015
- 7 • Hearing on the motions in limine: April 13, 2015, 1:30 p.m.
- 8 • Trial brief: April 9, 2015
- 9 • Any response to a trial brief: April 17, 2015
- 10 • Proposed jury instructions and verdict forms: April 16, 2015
- 11 • Final witness list: April 23, 2015
- 12 • List of all discovery documents for use at trial: April 23, 2015
- 13 • Proposed voir dire questions: April 23, 2015
- 14 • Joint agreed summary of the case: April 23, 2015

15 2. Pursuant to the parties' previous agreement, the parties have scheduled
16 the depositions of eight expert witnesses in this case. The series of eight expert
17 depositions will commence on March 19, 2015 and conclude on April 6, 2015. The
18 parties wish to continue the briefing deadlines and the hearing dates for any
19 additional motions in limine to allow these eight expert depositions to be completed
20 prior to the motion in limine filing deadline.

21 3. Accordingly, the parties request an Order continuing the filing
22 deadline for any additional motions in limine from March 11, 2015 to April 8,
23 2015, continuing the deadline to file oppositions from March 25, 2015 to April 13,
24 2015, continuing the deadline to file reply briefs from April 2, 2015 to April 15,
25 2015, and continuing the hearing date on any motions in limine and the trial
26 readiness conference from April 13, 2015 to April 20, 2015 at 1:30 p.m.

27 IT IS SO STIPULATED.

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Dated: March 6, 2015

Law Office of Steven Yourke

By: /s/ Steven R. Yourke
[As approved on March 6, 2015]
Steven R. Yourke

Attorneys for Plaintiffs
BRIAN REED, B.R., a minor, by her
guardian ad litem, Roxanne Sayers

Dated: March 6, 2015

Burke, Williams & Sorensen, LLP

By: /s/ Nathan A. Oyster
Susan E. Coleman
Nathan A. Oyster

Attorneys for Defendants
CITY OF MODESTO, CHIEF OF
POLICE MICHAESL HARDEN, AND
OFFICERS RON ZIYA AND CAELLI
KOEHLER, MUNICIPAL EMPLOYEES

ORDER

Having reviewed the parties' Stipulation and finding good cause therefor, it is hereby ORDERED that the briefing and hearing dates on any additional motions in limine are continued as follows:

L/D to file motions in limine: April 8, 2015

L/D to file oppositions: April 13, 2015

L/D to file replies: April 15, 2015

Hearing on Motions in Limine and Trial Readiness Conference: April 20, 2015, 1:30 p.m.

IT IS SO ORDERED.

Dated: March 9, 2015



SENIOR DISTRICT JUDGE