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6 Attorneys for Defendants  
CITY OF SANGER, SANGER CHIEF OF POLICE  
7 SILVER RODRIGUEZ, OFFICER ROBERT  
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8 OFFICER JASON BOUST, and OFFICER PRESTON  
LITTLE

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10 UNITED STATES DISTRICT COURT  
11 EASTERN DISTRICT OF CALIFORNIA

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13 ESPERANZA BOOKE, individually and  
as personal representative of the Estate of  
14 CHARLES SALINAS,

15 Plaintiff,

16 v.

17 COUNTY OF FRESNO, et al.,

18 Defendants.  
19

Case No.: 1:13-cv-00586-AWI-SAB

**STIPULATION TO CONTINUE MOTION  
FOR SUMMARY JUDGMENT DEADLINES**

20 The parties seek an order of the court extending the deadline for plaintiff to file opposition  
21 to defendants' motion for summary judgment, and the corresponding reply by defendants, due to  
22 a medical emergency delaying the deposition of an expert of the defendants. Dr. Matthew  
23 Sharps, disclosed as a cognitive expert for defendants, was set to be deposed on Monday,  
24 December 15, 2014. On Saturday, December 13, 2014, his wife suffered a heart attack and has  
25 been hospitalized. Dr. Sharps is not available as a result, and that may prejudice the ability of  
26 plaintiff's effort to oppose the motion for summary judgment and/or adjudication filed by  
27 defendants. The current schedule calls for plaintiff's opposition to be filed by December 29, 2014  
28 and the reply by January 5, 2015. The parties stipulate and request that the new date for

1 opposition be January 19, 2015 and the new date of the reply be January 26, 2015. The parties  
2 further stipulate and request a continuance of the hearing date, which is currently set for January  
3 12, 2015, to a date on or after February 2, 2015.

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5 Dated: December 16, 2014

ALLEN, GLAESSNER,  
HAZELWOOD & WERTH, LLP

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7 By: /s/ Dale L. Allen, Jr.

8 DALE L. ALLEN, JR.  
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10 Attorneys for Defendants  
11 CITY OF SANGER, SANGER CHIEF OF  
12 POLICE SILVER RODRIGUEZ, OFFICER  
13 ROBERT PULKOWNIK, OFFICER  
14 ANGELA YAMBUPAH, OFFICER JASON  
15 BOUST, and OFFICER PRESTON LITTLE

16  
17 Dated: December 16, 2014

LAW OFFICE OF ROBERT HAMPARYAN

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19 By: /s/Laura M. Sasaki

20 LAURA M. SASAKI  
21 Attorneys for Plaintiff  
22 ESPERANZA BOOKE, individually and as  
23 personal representative of the Estate of  
24 CHARLES SALINAS

25 IT IS SO ORDERED:

26 Plaintiff's opposition to defendants' motion for summary judgment is due on January 19,  
27 2015 and defendants' reply is due on January 26, 2015. The hearing on defendants' motion for  
28 summary judgment is continued to February 2, 2015 at 1:30 p.m. before Judge Anthony W. Ishii.

IT IS SO ORDERED.

Dated: December 17, 2014

  
UNITED STATES MAGISTRATE JUDGE