

1 William L. Schmidt, SBN. 206870
2 **WILLIAM L. SCHMIDT, ATTORNEY AT LAW, P.C.**
3 377 W. Fallbrook Ave., Suite 205
4 Fresno, CA 93711
5 Telephone: 559.261.2222
6 Facsimile: 559.436.8163
7 Email: legal.schmidt@gmail.com

8 Attorney for Plaintiffs THE ESTATE OF
9 STEPHEN E. CRAWLEY, NORMA
10 CRAWLEY, and JOHNNY CRAWLEY

11 Janell Van Bindsbergen
12 Roy Santos
13 **LOZANO SMITH**
14 7404 North Spalding Avenue
15 Fresno, CA 93720-3370
16 Telephone: 559.431.5600
17 Facsimile: 559.261.9366
18 Email: jvanbindsbergen@lozanosmith.com

19 Attorneys for CITY OF LEMOORE

20
21
22
23
24
25
26
27
28

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA – FRESNO DIVISION

THE ESTATE OF STEPHEN E. CRAWLEY,
NORMA CRAWLEY, individually and as personal
representative of ESTATE OF STEPHEN E.
CRAWLEY, JOHNNY CRAWLEY, individually
and as personal representative of ESTATE OF
STEPHEN E. CRAWLEY

Plaintiff,

v.

KINGS COUNTY; KINGS COUNTY SHERIFFS
DEPARTMENT; DAVE ROBINSON, individually,
and in his capacity as Kings County Sheriff;
SHAWN McRAE, individually, and in his capacity
as sergeant for Kings County Sheriff; MARIUS
BARSTECEANU, individually, and in his capacity
as senior deputy for Kings County Sheriff; and
DOES 1-50, inclusive,

Defendants.

Case No. 1:13-CV-02042 LJO-SAB

**JOINT STIPULATION TO CONTINUE
HEARING DATE re. PLAINTIFF'S
MOTION TO COMPEL**

1 Plaintiffs THE ESTATE OF STEPHEN E. CRAWLEY, NORMA CRAWLEY, and JOHNNY
2 CRAWLEY (hereinafter "Plaintiffs") and THE CITY OF LEMOORE AND OFFICER MICHAEL
3 KENDALL (hereinafter "City") hereby submit the following stipulation to modify the operative
4 scheduling order in this case.

5 **RECITALS**

6 WHEREAS, on April 8, 2015, Plaintiffs' filed a motion to compel the deposition testimony of
7 Lemoore Police Department Officer Michael Kendall and the production of documents responsive to
8 twenty-one requests for production.

9 WHEREAS, on April 21, 2015, Plaintiffs and City met and conferred about the discovery
10 disagreement. Discussions were productive and show promise for the potential resolution of this
11 discovery dispute, and thus may render the present motion to compel unnecessary.

12 WHEREAS, on April 22, 2015, the parties must submit a joint statement to the court pursuant to
13 Local Rule 251 no less than 7 days before the scheduled hearing.

14
15 **STIPULATION**

16 Now, therefore, IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiffs and
17 City, through their respective counsel, that the present hearing schedule on this matter be modified to
18 provide the City Attorney additional time to consult with her client on resolution of the present
19 discovery disagreement and the parties additional time to draft the joint statement regarding discovery
20 disagreement as follows:

21 Last day to submit Joint Statement regarding Discovery Disagreement: **April 29, 2015**

22
23 Hearing date for Plaintiffs' Motion to Compel Deposition Testimony
24 and Production of Documents: **May 6, 2015 at 8:30
25 or a date and time
thereafter.**

26 Dated: April 22, 2015

WILLIAM L. SCHMIDT, ATTORNEY AT LAW, P.C.

27 By: /s/ William L. Schmidt
28 William L. Schmidt
Attorney for Plaintiffs

1
2 Dated: April 22, 2015

LOZANO SMITH

3
4 By: /s/ Jenell Van Bindsbergen
5 Jenell Van Bindsbergen
6 Attorneys for City of Lemoore

7 IT IS SO ORDERED.

8 Dated: April 22, 2015



9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
UNITED STATES MAGISTRATE JUDGE