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9 **UNITED STATES DISTRICT COURT**  
10 **EASTERN DISTRICT OF CALIFORNIA**

11 WILLIAM JOHNSON, ) CASE NO.: 1:15-CV-01540 JLT  
12 )  
13 Plaintiff, ) **STIPULATION TO CONTINUE DISCOVERY**  
14 ) **DEADLINE FOR THE SOLE PURPOSE OF**  
15 Vs. ) **TAKING ONE ADDITIONAL DEPOSITION;**  
16 ) **[PROPOSED] ORDER**  
17 )  
18 CITY OF RIDGECREST, a California ) (Doc. 26)  
19 Municipality, and DOES 1 through 20, inclusive, )  
20 )  
21 Defendants. )  
22 )  
23 )  
24 )  
25 )  
26 )  
27 )

28 **TO THIS HONORABLE COURT:**

Defendant CITY OF RIDGECREST (“City”) and Plaintiff WILLIAM JOHNSON (“Plaintiff”) stipulate as follows:

The current discovery deadline is December 12, 2016. Plaintiff’s deposition is currently scheduled for December 7, 2016.

However, counsel for City and Plaintiff made progress in settlement discussions on December 1, 2016, and City expects Plaintiff to present a counter-offer/proposal that, if accepted, would resolve the

1 entirety of this dispute without further litigation and associated fees. At the very least, City's counsel is  
2 required to present the written counter-offer/proposal to the City Council, which meets on December 21,  
3 2016.

4 If the Court grants this extension, the parties have agreed to re-schedule the deposition for  
5 December 23, 2016, which is the next date available for Plaintiff and counsel.

6 Based on the foregoing, the parties respectfully request that the discovery cut-off is continued to  
7 December 23, 2016, for the sole purpose of taking Plaintiff's deposition.  
8

9 DATED: December 2, 2016

LEMIEUX & O'NEILL

10  
11 */s/ Michael Silander*

12 By \_\_\_\_\_  
13 Michael Silander  
14 Attorneys for Defendant  
City of Ridgecrest

15 DATED: December 2, 2016

POTTER, HANDY

16  
17 */s/ Raymond Ballister*

18 By \_\_\_\_\_  
19 Raymond Ballister  
20 Attorneys for William Johnson  
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**[PROPOSED] ORDER**

The current discovery cut-off is December 12, 2016. For good cause shown, the request to take the plaintiff's deposition on December 23, 2016, despite the expiration of the discovery deadline, is **GRANTED.**

IT IS SO ORDERED.

Dated: December 2, 2016

/s/ Jennifer L. Thurston  
UNITED STATES MAGISTRATE JUDGE