

1 Adam U. Lindgren, City Attorney (SBN: 177476)  
CITY OF MODESTO  
2 1010 10th Street, Suite 6300  
3 PO BOX 642  
4 Modesto, CA 95353  
5 Telephone: (209) 577-5284  
6 Facsimile: (209) 544-8260

7 Blake P. Loeb (SBN: 145790)  
8 bloeb@meyersnave.com  
9 David Mehretu (SBN: 269398)  
10 dmehretu@meyersnave.com  
11 MEYERS, NAVE, RIBACK, SILVER & WILSON  
12 555 12<sup>th</sup> Street, Suite 1500  
13 Oakland, CA 94607  
14 Telephone: (510) 808-2000  
15 Facsimile: (510) 444-1108

16 Attorneys for Defendants City of Modesto, Tom Fara, and  
17 Brent Salyer

18 **UNITED STATES DISTRICT COURT**

19 **EASTERN DISTRICT OF CALIFORNIA, FRESNO DIVISION**

20 DONNA FLETCHER; NATHAN  
21 FLETCHER; and N.F., a minor by and  
22 through his Guardian Ad Litem, DONNA  
23 FLETCHER,

24 Plaintiffs,

25 v.

26 THE CITY OF MODESTO; TOM FARA;  
27 BRENT SALYER; and DOES 1 through 50,  
28 inclusive,

Defendants.

Case No. 1:16-CV-01512-LJO-EPG

**STIPULATION AND ORDER  
EXTENDING TIME FOR DEFENDANTS  
TO RESPOND TO FIRST AMENDED  
COMPLAINT**

Trial Date: None Set

1 Plaintiffs Donna Fletcher; Nathan Fletcher; and N.F., a minor by and through his Guardian  
2 Ad Litem, Donna Fletcher (collectively, the “Plaintiffs”), and Defendants City of Modesto, Officer  
3 Tom Fara, and Officer Brent Salyer (collectively, the “Defendants”), hereby agree and stipulate as  
4 follows:

- 5 1. Plaintiffs filed their First Amended Complaint in this action on March 7, 2017.  
6 (Dkt. 28.)
- 7 2. Defendants’ response is otherwise due on March 21, 2017.
- 8 3. The parties continue to be involved in settlement related discussions and as a result  
9 jointly request that Defendants have until **April 20, 2017** to file a responsive pleading to  
10 Plaintiffs’ First Amended Complaint. The parties do not anticipate requesting any further  
11 extensions of this deadline.

12  
13 IT IS SO STIPULATED.

14 DATED: March 15, 2017 MEYERS, NAVE, RIBACK, SILVER & WILSON

15  
16 By: /S/ Blake P. Loeb  
17 Blake P. Loeb  
18 Attorneys for Defendants City of Modesto; Tom  
Fara; Brent Salyer

19 DATED: March 15, 2017 BRUNO NALU

20  
21 By: /S/ Gregory Peacock  
22 Gregory Peacock  
Attorney for Plaintiffs

23 The filer, Blake P. Loeb, attests that all other signatories listed on whose behalf this filing  
24 is submitted concur in the filing’s content and have authorized the filing.

25  
26  
27  
28

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**ORDER**

GOOD CAUSE APPEARING, the above Stipulation is accepted and adopted as the Order of this Court and Defendants have until April 20, 2017 to file a responsive pleading to Plaintiffs' First Amended Complaint.

IT IS SO ORDERED.

Dated: March 20, 2017

/s/ Eric P. Groj  
UNITED STATES MAGISTRATE JUDGE