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15 *Attorneys for Plaintiff,*
16 **RANDY BEAVERS**

17 **UNITED STATES DISTRICT COURT**
18 **EASTERN DISTRICT OF CALIFORNIA**

19 RANDY BEAVERS,)	Case No. 1:16-cv-01878-LJO-BAM
20)	
21 Plaintiff,)	STIPULATION TO EXTEND
22)	DEADLINE FOR FILING OF MOTION
23 vs.)	FOR ATTORNEY’S FEES & COSTS;
24)	ORDER
25 CITY OF TURLOCK, a municipal)	
26 corporation, et al.,)	(ECF No. 37)
27)	
28 Defendants.)	
)	
)	
)	

29 **TO THE CLERK OF THE COURT, ALL PARTIES, AND THEIR ATTORNEYS**
30 **OF RECORD:**

31 Plaintiff RANDY BEAVERS (“Plaintiff”) and Defendants CITY OF TURLOCK, et al.,
32 hereby respectfully request a **three-week** extension of the deadline by which to file dispositional
33 documents and/or a motion for attorney’s fees and costs, from **November 6, 2018**, as prescribed
34 by the first extension from the original date prescribed by the Court’s Minute Order
35 memorializing the parties’ acceptance of the mediator’s proposal (ECF No. 34), **September 7,**
36 **2018, to November 27, 2018**, in order to provide the parties with additional time within which to

1 meet-and-confer, and potentially obviate the need to litigate a motion.

2 As noted above, this is the second extension requested by the parties. The reason is for
3 the extension is that Plaintiff's counsel has been awaiting an Order on a motion for attorney's
4 fees in a different matter that is also venued in the Eastern District, which counsel anticipated
5 would be directly instructive as to the rates for counsel in this case.

6 Respectfully submitted,

7 Dated: November 15, 2018

LAW OFFICES OF SANJAY S. SCHMIDT

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10 By: /s/ Sanjay S. Schmidt
SANJAY S. SCHMIDT
Attorneys for Plaintiff
RANDY BEAVERS

11
12 Dated: November 15, 2018

LAW OFFICES OF PANOS LAGOS

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14 By: /s/ Panos Lagos
PANOS LAGOS
Attorneys for Plaintiff
RANDY BEAVERS

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16
17 Dated: November 15, 2018

ALLEN, GLAESSNER,
HAZELWOOD & WERTH, LLP

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19 By: /s/ Kevin P. Allen
DALE L. ALLEN, JR.
KEVIN P. ALLEN
Attorneys for Defendants
CITY OF TURLOCK; GREGORY W.
ROTON; DUSTIN M. FERREIRA; GABRIEL
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28 GONZALEZ; and PAUL INDERBITZEN

1 **ORDER**

2 Pursuant to the stipulation of the parties (ECF No. 37), and finding good cause,

3 IT IS ORDERED that the parties are granted an extension to **November 27, 2018** to file
4 dispositional documents and/or a motion for attorney's fees and costs, as prescribed by the
5 Court's Minute Order memorializing the parties' acceptance of the mediator's proposal (ECF
6 No. 34).

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9 IT IS SO ORDERED.

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11 Dated: **November 15, 2018**

12 /s/ Eric P. Gray
13 UNITED STATES MAGISTRATE JUDGE