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Attorneys for Defendants  
CITY OF MODESTO and GALEN CARROLL

**UNITED STATES DISTRICT COURT**  
**EASTERN DISTRICT, FRESNO DIVISION**

ESTATE OF KIM JACKSON, et al.,

Plaintiffs,

v.

CITY OF MODESTO, et al.,

Defendants.

Case No. 1:21-CV-00415-AWI-EPG

**STIPULATION TO EXTEND DATE FOR  
DEFENDANT CITY OF MODESTO TO  
RESPOND TO PLAINTIFF'S FIRST  
AMENDED REQUEST FOR PRODUCTION,  
SET ONE; ORDER**

**(ECF No. 52)**

**STIPULATION**

Pursuant to Local Rule 144(a), Plaintiffs Estate of Kim Jackson, Matthew Boring, Alyssa Cabrera, Glenn Jackson, and Anna Jackson and Defendants City of Modesto and Galen Carroll (collectively, the "Parties"), by and through their counsel of record, hereby stipulate and agree as follows:

1. On September 20, 2022, Plaintiff Estate of Kim Jackson (hereinafter "Estate") served by mail Defendant City of Modesto (hereinafter "City") with First Amended Request for Production, Set One containing 51 requests for production seeking a variety of materials, including materials related to the subject officer-involved shooting and the following materials for each of the three involved officers: personnel files, training records, psychiatric and psychological evaluations, prior testimony, complaints, investigation of complaints, use of force incidents, and disciplinary history.

2. The Estate previously granted the City a 28-day extension of time to respond, to and including November 21, 2022.

1           3.       According to the City's counsel, the City has been diligently gathering the requested  
2 materials; however, despite best efforts it has yet to collect and review all of the responsive materials.  
3 The City's response has been delayed by the unavailability of personnel, including the City's  
4 counsel's point-of-contact at the Modesto Police Department who will be out-of-office until  
5 November 29, 2022, and the City's counsel's paralegal who will not be able to complete the  
6 production until December 12, 2022.

7           4.       Subject to the Court's approval under Local Rule 144(a), the Parties agree to extend  
8 the deadline for the City to respond to the Estate's First Amended Request for Production, Set One,  
9 by an additional 21 days, up to and including December 12, 2022.

10           IT IS SO STIPULATED.

11           DATED: November 18, 2022

Respectfully submitted,

12           LAW OFFICE OF MARK E. MERIN

13                               */s/ Paul H. Masuhara*

14                               (as authorized on November 18, 2022)

15           By: \_\_\_\_\_

MARK E. MERIN

PAUL H. MASUHARA

16           Attorneys for Plaintiffs ESTATE OF KIM  
17 JACKSON, MATTHEW BORING, ALYSSA  
18 CABRERA, GLENN JACKSON, and ANNA  
JACKSON

19  
20           DATED: November 18, 2022

RIVERA HEWITT PAUL LLP

21                               */s/ Jonathan B. Paul*

22           By: \_\_\_\_\_

JONATHAN B. PAUL

23           Attorneys for Defendants CITY OF  
24 MODESTO and GALEN CARROLL

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IT IS SO ORDERED.

/s/ Eric P. Grogg  
UNITED STATES MAGISTRATE JUDGE