1 2 3 4 5 6 7 8	JOHN L. BURRIS, ESQ. SBN 69888 BENJAMIN NISENBAUM, ESQ. SBN 222173 JAMES COOK, ESQ, SBN 300212 LAW OFFICES OF JOHN L. BURRIS Airport Corporate Centre 7677 Oakport Street, Suite 1120 Oakland, California 94621 (510) 839-5200 Attorney for Plaintiff ISABEL BEL MONTEZ JOSEPH GARCIA SR. UNITED STATE	S DISTRICT COURT	
9	FOR THE EASTERN DISTRICT OF CALIFORNIA		
10			
11	ISABEL BEL MONTEZ, et al.	Case No. 2:10-cv-03149 MCE EFB	
12	Plaintiff,	STIPULATION AND ORDER FOR	
13	VS.	CONTINUANCE OF PRETRIAL SCHEDULING ORDER DEADLINES	
14 15 16 17 18 19	CITY OF STOCKTON, a municipal corporation; CITY OF STOCKTON POLICE DEPARTMENT; BLAIR ULRING in his capacity as CHIEF OF POLICE for the CITY OF STOCKTON POLICE DEPARTMENT; DOES 1-100, inclusive; individually and in their capacities as POLICE OFFICERS for CITY OF STOCKTON POLICE DEPARTMENT.	Judge: United States Magistrate Judge Edmund F. Brennan Complaint Filed: November 22, 2010 Trial: March 13, 2017	
20	Defendants.	_	
21		_	
22	IT IS HEREBY STIPULATED by and between Plaintiffs, through attorneys of record,		
23	JAMES COOK, and BEN NISENBAUM, Law Offices of John Burris; and Defendants, CITY OF		
24	STOCKTON, et al., by and through attorneys of record TED DANIEL WOOD, that the following		
25	deadlines be continued:		
26	Discovery Completion: June 1 2016 (Prior date was March 14, 2016)		
27	Expert Disclosure: August 1, 2	August 1, 2016 (Prior date was May 13, 2016)	
28	Supplemental Expert Disc: August 20,	2016 (Prior date was June 2, 2016)	
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Last Day for Dispositive Motions: November 15, 2016 (Prior date was September 15, 2 2016).

All other dates remain as set forth in the Court's Second Amended Pretrial Scheduling Order (Document 23).

The Court requested that Plaintiffs' counsel show good cause for a continuance. Plaintiffs' counsel assert that there is good cause for a continuance, because until recently we had no contact with the client. Without client contact, we could not secure verification signatures to accompany discovery responses. The extra time is necessary to allow time for Plaintiffs' counsel to establish consistent communication with minors I.G. and J.G. as well as determine whether they wish to continue pursuing the case.

**IT IS SO STIPULATED.** 

Dated: February 29, 2016

00 0010 Dated: Feb

By: <u>/s/ James Cook</u> James Cook Law Offices of John Burris Attorney for Plaintiff

l: February 29, 2016		By: <u>/s/ Ted Daniel Wood</u> Ted Daniel Wood City of Stockton Attorney for Defendant
	ORDER	

In accordance with the parties' stipulation, and good cause appearing, the deadlines specified above are continued in accordance with the foregoing request. All other dates and deadlines set forth in Court's Second Amended Pretrial Scheduling Order remain in full force and effect.

IT IS SO ORDERED.

Dated: February 29, 2016

MORRISON C. ENGLAND, JR., CHIEF JUDGE UNITED STATES DISTRICT COURT

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