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5 Attorneys for Plaintiff  
 Sandipkumar Tandel

6 **UNITED STATES DISTRICT COURT**  
 7 **EASTERN DISTRICT OF CALIFORNIA**

9 SANDIPKUMAR TANDEL,  
 10 Plaintiff,  
 11 vs.  
 12 COUNTY OF SACRAMENTO, et al.,  
 13 Defendants.

CASE NO. 2:11-cv-00353 MCE AC

**JOINT STIPULATION AND FOR  
 EXTENSION OF TIME FOR THE  
 FILING OF TRIAL DOCUMENTS;  
 ORDER THEREON**

14  
 15 Plaintiff, Sandipkumar Tandel, is represented by Geri Green of the Law Offices of Green  
 16 & Green LLP, and Dennise S. Henderson of the Law Office of Dennise S. Henderson.  
 17 Defendants, Attorneys for Defendants County of Sacramento, John McGinness, Deputy  
 18 Stephanie Jacoby and Deputy Mark Medeiros are represented by Van Longyear and Peter C.  
 19 Zilaff of Longyear, O’Dea & Lavra, LLP.

20 The parties are mindful of the extensive length of trial and the Court’s impacted criminal  
 21 trial calendar. The parties met and conferred and requested in a pending stipulation that the trial  
 22 and pre-trial dates be continued to February 2016 in the interest of judicial economy. (Dkt. 168)  
 23 While that stipulation remains under submission, on June 4, 2015, on its own motion vacated the  
 24

1 August 31, 2015, jury trial date and continued it to September 8, 2015, and vacated and  
2 continued the July 9, 2015, Final Pretrial Conference date to July 30, 2015. (Dkt.169.)  
3 The Court left all other due dates set forth in the Court's November 12, 2014 Order Continuing  
4 Trial. (Dkt.164.)

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6 The parties now, jointly, request that the due dates for the trial documents be extended for  
7 21 days to correspond to the new date for the Final Pretrial Conference. This request is made on  
8 the basis that the parties are engaging and meaningful discussions and collaborations concerning  
9 numerous stipulations that would decrease the length of time required to try this case. The  
10 stipulations require more time and collaboration between the parties.

11 Ms. Green has just returned to her office after being away for three weeks. Her father  
12 and former law partner is gravely ill and declining rapidly requiring her attention. She is also ill  
13 making collaboration difficult at this time. While she is expected to recover, her father, likely,  
14 will not. Consequently, the parties request that the filing dates for the trial documents track the  
15 new Final Pretrial Conference date and be extended for 21 days as follows:  
16

| <u>Documents</u>                      | <u>Present Date Due</u> | <u>Requested Date</u> |
|---------------------------------------|-------------------------|-----------------------|
| 17 Joint Final Pretrial Statement     |                         |                       |
| 18 Procedural and Evidentiary Motions | June 18, 2015           | July 9, 2015          |
| 19 Trial Briefs and Oppositions       | June 25, 2015           | July 16, 2015         |
| 20 Replies                            | July 2, 2015            | July 23, 2015         |
| 21                                    |                         |                       |
| 22                                    |                         |                       |

23 This request is made on the assumption that the Court's calendar will not be adversely  
24 affected by the requested continuance in light of the Court's continuance of the Final Pretrial  
25 Conference and trial dates.

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IT IS SO STIPULATED:

Dated: June 15, 2015

LAW OFFICES OF GREEN & GREEN LLP

/S/: Geri Green  
GERI GREEN  
Attorneys for Plaintiff

Dated: June 2, 2015

LONGYEAR, O'DEA & LAVRA, LLP

/S/: Peter C. Zilaff  
PETER C. ZILAFF  
Attorneys for Defendants,  
County of Sacramento, et al.

IT IS SO ORDERED.

Dated: June 16, 2015

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