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15 **UNITED STATES DISTRICT COURT**
 16 **EASTERN DISTRICT OF CALIFORNIA SACRAMENTO DIVISION**

18 ROCHELLE L. GILLIAM,)	Case No.: 2:13-CV-02276-WBS-AC
19 Plaintiff,)	
20 vs.)	[PROPOSED] STIPULATION TO
21 CITY OF WEST SACRAMENTO, SERGIO)	MODIFY SCHEDULING ORDER TO
22 ALVAREZ, DAN DRUMMOND, and DOES)	EXTEND DISCOVERY COMPLETION
23 1 through 25,)	DEADLINES
24 Defendants)	

25 All parties to this lawsuit, by and through their respective attorneys, stipulate and agree to
 26 request that this court modify the existing scheduling order issued by this court on January 29,
 27 2015 to extend the time to complete discovery until April 27, 2015. This joint request is based
 28 on the following:

[PROPOSED] STIPULATION TO MODIFY SCHEDULING ORDER TO
 EXTEND DISCOVERY COMPLETION DEADLINES

1 1. On January 26, 2015, the parties herein filed a stipulation and proposed order to extend
2 pretrial deadlines and requested that the court refer this case to a settlement conference with
3 Magistrate Judge Delaney. The reason for the request was to allow the parties to conduct a
4 settlement conference with Judge Delaney for a date in March 2015, before the expert disclosure
5 deadline, and to allow the parties an additional two weeks to complete discovery if necessary,
6 after the parties attended the settlement conference.

7 2. On January 29, 2015, the court issued an order setting a discovery deadline of March 27,
8 2015, expert disclosure May 18, 2015, completion of expert discovery by June 8, 2015, and a last
9 day to file dispositive motions on June 29, 2015. The Court also issued an order that the parties
10 attend a settlement conference with Magistrate Judge Delaney on March 13, 2015 at 9:30 a.m.

11 3. The parties at this time have been attempting to schedule various depositions, including
12 the deposition of the plaintiff, the deposition of defendant Alvarez, the depositions of defendants
13 employed by the West Sacramento Police Department, and some percipient witness depositions.
14 However, the parties wish to avoid incurring costs of deposition and other discovery before the
15 settlement conference. However, the current scheduling order requires discovery completion by
16 March 27, 2015, therefore, if the matter is not resolved at the settlement conference, the parties
17 will only have two weeks to complete discovery. The parties believe that by extending the
18 discovery cut off another thirty (30) days, there will be adequate time to conduct the discovery if
19 the case is not settled, in manner which is mutually convenient to the schedule of the attorneys
20 herein, and without effecting any of the other pretrial dates scheduled in the case.

21 Therefore, all parties request that the scheduling order of January 29, 2015 be amended to set
22 the deadline to complete discovery be extended by thirty (30) days to April 27, 2015.

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1 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

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3 Dated: February 18, 2015

THE ASHWORTH LAW OFFICES

4 /s/ James C. Ashworth

JAMES C. ASHWORTH
Attorneys for Plaintiff

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6
7 Dated: February 18, 2015

ANGELO, KILDAY & KILDUFF

8 /s/ Bruce Kilday

9 BRUCE KILDAY
10 Attorneys for Defendants City of West
11 Sacramento
12 and Chief Dan Drummond

13 Dated: February 18, 2015

LONGYEAR, O'DEA & LAVRA, LLP

14 /S/ John Lavra

15 JOHN LAVRA
16 Attorneys for Defendant
17 Sergio Alvarez
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21 PURSUANT TO STIPULATION, IT IS SO ORDERED.

22 Dated: February 19, 2015

23 Allison Claire

24 ALLISON CLAIRE
25 UNITED STATES MAGISTRATE JUDGE
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