1 William C. Jeanney, Esq. MAR 24 2015 California State Bar No. 122585 2 BRADLEY, DRENDEL & JEANNEY P.O. Box 1987 CLERK, U.S. DISTRICT COURT EASTERN DISTRICT OF CALIFORNIA 3 Reno, NV 89505 Telephone No. (775) 335-9999 Facsimile No. (775) 335-9993 DEPUTY CLERK 4 5 Attorneys for Plaintiff 6 Gayle K. Tonon, Esq. 7 California State Bar No. 110427 Tonon & Associates 8 Post Office Box 2536 Truckee, California 96160 Telephone No. (530) 587-0333 Facsimile No. (530 587-1545 9 10 Attorneys for Defendants Richard Ortiz, City of Altruas and Altruas City Police Department 11 12 13 UNITED STATES DISTRICT COURT 14 EASTERN DISTRICT OF CALIFORNIA 15 TYLER B. QUINN, Case No. 2:14-CV-00744-JAM-CMK 16 Plaintiff, STIPULATION AND ORDER TO 17 EXTEND DEADLINES RICHARD ORTIZ, individually and in his 18 official capacity; and CITY OF ALTURAS, ex rel. the ALTURAS CITY POLICE 19 DEPARTMENT, 20 Defendants. 21 22 COME NOW the parties by and through their attorneys and hereby stipulate to extend the 23 current discovery deadlines as follows: 24 Current Deadline **New Deadline** Description 25 **Expert Disclosures** 4/03/15 6/15/15 26 Rebuttal Disclosures 7/15/15 4/10/15 27 28 -1-Our File No. 202466

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Discovery Deadlines 6/05/15 8/15/15 The parties have been diligent in pursuing discovery and both have taken depositions.

Written discovery has been propounded and answered by both parties.

Plaintiff's counsel has the following trials that he has been preparing for:

- Fansler v. Golden Road, 2nd Judicial District Court Case Number CV13-02297. 1. Trial is to begin April 13, 2015 through April 20, 2015.
- 2. Fisher v. Demarcas, Superior Court of California, County of Contra Costa, Case Number MSC13-01377. Trial is to begin April 13, 2015 through April 17, 2015. With an Issues conference scheduled for March 19, 2015.
- Carlson v. Sierra Nevada Construction, Inc., 2nd Judicial District Court Case 3. Number CV12-02585. Trial is scheduled for two weeks beginning April 27, 2015.
- Kaufman v. Public Restroom, 2nd Judicial District Court Case Number 4. CV11-01355. Trial is scheduled to begin May 4, 2015.

In addition Plaintiff's counsel had a mediation last week and has been in Salt Lake City this week for various depositions.

Defendants' counsel has a trial, Spann v. Grass Valley School District, et al. Nevada County Superior Court Case Number CU14-080361. This trial is to begin March 17, 2015 and is anticipated to last at least a month.

Therefore the parties need to extend the discovery to allow more time to complete the same.

day of March 2015.

BRADLEY DRENDEL & JEANNEY

William C. Jeanney, Esq.
Attorney for Plaintiff, Tyler Quinn

Dated this \ \ day of March 2015.

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TONON & ASSOCIATES

Gayle K. Tonon, Esq.
Attorneys for Defendants, Richard
Ortiz, City of Alturas and Alturas City

Police Department

IT IS SO ORDERED:

Dated this $\frac{24^{4}}{100}$ day of March 2015.

United States District Judge

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