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

CYNTHIA DE JESUS-EDMUNSON,  
Plaintiff,  
*vs.*  
CITY OF SACRAMENTO; and  
DOES 1-50, Inclusive,  
Defendants.

CASE NO. 2:15-cv-00550-TLN-CKD  
Civil Rights

*[The Honorable Troy L. Nunley]*

## STIPULATION TO CONTINUE TRIAL DATE AND PRETRIAL DEADLINES; ORDER

Current Trial Date: 5/22/2017  
Proposed Trial Date: 11/20/2017  
Current Final Pretrial Conference: 3/23/2017  
Proposed Final Pretrial Conference: 9/25/2017  
Current Discovery Completion Date: 6/24/2016  
Proposed Discovery  
Completion Date: 12/27/2016

1 Plaintiff, CYNTHIA DE JESUS-EDMUNSON, and Defendant, CITY OF  
2 SACRAMENTO, by and through their respective attorneys, Anthony E.  
3 Goldsmith, Steven L. Derby, and Katherine E. Underwood, hereby jointly stipulate  
4 and request the trial date and pretrial deadlines in this to be continued for good  
5 cause as shown below. Presently, trial in this case is scheduled to begin on May  
6 22, 2017. This first request for an extension of time is based on the following good  
7 cause:

- 8 1. On March 11, 2015, Plaintiff, by and through counsel, filed her Complaint  
9 for damages and injunctive relief, arising out of an incident that occurred on  
10 or about, February 20, 2014, which involves the alleged deprivation of  
11 Plaintiff's civil rights, as well as personal injuries.
- 12 2. The parties have both discovered and agree there are factual issues in  
13 contention that don't involve the physical condition of the city's public  
14 rights of way and that discovery should be done in phases. Therefore, both  
15 parties wish to extend time for Discovery, specifically in regards to technical  
16 issues involving the city's public rights of way.
- 17 3. This is the first request for an extension and although both parties  
18 understand the importance of keeping the Court's timeline, all involved are  
19 working together cooperatively and believe the extensions will likely result  
20 in settlement, as opposed to having to proceed to trial.
- 21 4. Based on the foregoing, the parties jointly stipulate and request that the  
22 Court continue the current trial date from May 22, 2017, to November 20,  
23 2017.
- 24 5. That the current final pretrial conference be continued from March 23, 2017,  
25 to September 25, 2017.

- 1       6. That the associated deadlines be continued as follows:  
2  
3       a. Trial: November 20, 2017  
4       b. Final Pretrial Conference: September 25, 2017  
5       c. Joint Final Pretrial Conference Statement: September 18, 2017  
6       d. Filing of Trial Brief: November 6, 2017  
7       e. Last Date to Hear Dispositive Motions: June 5, 2017  
8       f. Non-Expert Discovery Cutoff (Fact): December 27, 2016  
9       g. Expert Disclosure (Initial): February 21, 2017  
10      h. Expert Disclosure (Rebuttal): March 17, 2017  
11      i. Expert Discovery Cutoff: April 7, 2017

12  
13   **IT IS SO STIPULATED**

14  
15 DATED: March 23, 2016

**LAW OFFICES OF ANTHONY E.  
GOLDSMITH**

16  
17 By: /s/ Anthony Goldsmith  
18       Anthony E. Goldsmith  
19       Attorney for Plaintiff,

20       CYNTHIA DE JESUS-EDMUNSON

21 DATED: March 23, 2016

**THE DERBY LAW FIRM**

22 By: /s/ Steven Derby

23       Steven Derby  
24       Attorney for Plaintiff,

25       CYNTHIA DE JESUS-EDMUNSON  
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1 DATED: March 23, 2016

**CITY OF SACRAMENTO**

2 By: /s/ Katherine Underwood

3 Katherine E. Underwood

4 Attorney for Defendant,

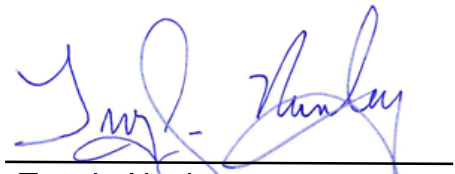
5 CITY OF SACRAMENTO

1 **ORDER**

2 Pursuant to the parties' Stipulation to Continue Trial Date and Pretrial Deadlines, and  
3 for good cause shown, the Court hereby GRANTS a continuance of the trial and pretrial  
4 deadlines as follows:

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|---|---|
| 6 a. Trial:                                     | <b>November 27, 2017, at 9:00 a.m.</b>  |
| 7 b. Final Pretrial Conference:                 | <b>September 21, 2017, at 2:00 p.m.</b> |
| 8 c. Joint Final Pretrial Conference Statement: | <b>September 14, 2017</b>               |
| 9 d. Filing of Trial Brief:                     | <b>November 13, 2017</b>                |
| 10 e. Last Date to Hear Dispositive Motions:    | <b>June 1, 2017</b>                     |
| 11 f. Non-Expert Discovery Cutoff (Fact):       | December 27, 2016                       |
| 12 g. Expert Disclosure (Initial):              | February 21, 2017                       |
| 13 h. Expert Disclosure (Rebuttal):             | March 17, 2017                          |
| 14 i. Expert Discovery Cutoff:                  | April 7, 2017                           |
- 15

16  
17 Dated: March 24, 2016

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20 Troy L. Nunley  
21 United States District Judge  
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