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

17 CYNTHIA DE JESUS-EDMUNSON,
18 Plaintiff,
19 *vs.*
20 CITY OF SACRAMENTO; and
21 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 C

Proposed Discovery

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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.

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13 IT IS SO STIPULATED

DATED: March 23, 2016

LAW OFFICES OF ANTHONY E.

GOLDSMITH

By: /s/ Anthony Goldsmith
Anthony E. Goldsmith
Attorney for Plaintiff,
CYNTHIA DE JESUS

DATED: March 23, 2016

THE DERBY LAW FIRM

By: /s/ Steven Derby

Steven Derby

Attorney for Plaintiff.

CYNTHIA DE JESUS-EDMUNSON

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

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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:	November 27, 2017, at 9:00 a.m.
7 b. Final Pretrial Conference:	September 21, 2017, at 2:00 p.m.
8 c. Joint Final Pretrial Conference Statement:	September 14, 2017
9 d. Filing of Trial Brief:	November 13, 2017
10 e. Last Date to Hear Dispositive Motions:	June 1, 2017
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

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17 Dated: March 24, 2016

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Troy L. Nunley
United States District Judge