

1 Anthony Goldsmith, Esq. (State Bar #: 125621)
 LAW OFFICES OF ANTHONY E. GOLDSMITH
 2 1841 Arteique Road
 Topanga, CA 90290
 3 Tel.: (818) 343-1370
 Fax: (310) 455-2968
 4 E-Mail: agoldsmith@goldsmithlawoffices.com
 Attorney for Plaintiff, CYNTHIA DE JESUS-EDMUNSON

5 Steven L. Derby, Esq. (State Bar # 148372)
 THE DERBY LAW FIRM
 6 1255 Treat Blvd., Suite 300
 Walnut Creek, CA 94597
 7 Tel.: (925) 472-6640
 Fax: (925) 472-6643
 8 E-Mail: derby@derbydisabilitylaw.com
 Attorney for Plaintiff, CYNTHIA DE JESUS-EDMUNSON

9 Katherine E. Underwood, Esq. (State Bar # 249308)
 10 SACRAMENTO CITY ATTORNEY'S OFFICE
 915 I St., 4th Floor
 11 Sacramento, CA 95814
 Tel.: (916) 808-5346
 12 Fax: (916) 808-7455
 E-Mail: kunderwood2@cityofsacramento.org
 13 Attorney for Defendant, CITY OF SACRAMENTO

14 UNITED STATES DISTRICT COURT
 15 EASTERN DISTRICT OF CALIFORNIA

16 CYNTHIA DE JESUS-EDMUNSON,
 17
 18 Plaintiff,
 19 vs.
 20 CITY OF SACRAMENTO; and DOES 1-
 21 50, Inclusive,
 22 Defendants.

Case No.: 2:15-CV-00550-TLN-CKD
**STIPULATION AND
 ORDER CONTINUING FACT
 DISCOVERY DEADLINES**

23 Plaintiff, CYNTHIA DE JESUS-EDMUNSON, and Defendant, CITY OF
 24 SACRAMENTO, by and through their respective attorneys, Anthony E. Goldsmith, Steven
 25 L. Derby, and Katherine E. Underwood, hereby jointly stipulate and respectfully request the
 26 trial date and pretrial deadlines in this case to be continued for good cause as shown below.
 27 Presently, trial in this case is scheduled to begin on June 4, 2018. This request for an
 28 extension of discovery deadlines is based on the following good cause:

- 1 1. On March 11, 2015, Plaintiff, by and through counsel, filed her Complaint for
2 damages and injunctive relief, arising out of an incident that occurred on or about
3 February 20, 2014, which involves the alleged deprivation of Plaintiff's civil
4 rights, as well as personal injuries.
- 5 2. Plaintiff has endured two serious illnesses unrelated to her injuries allegedly
6 sustained in the case before the Court. Additionally, Plaintiff is in the process of
7 recovering additional medical records related to this case and both parties want to
8 be sure that Defendants have all of Plaintiff's medical records before taking her
9 deposition. Accordingly, the parties ask that the Court to extend the discovery
10 cut-off date in this case from July 14, 2017 to September 14, 2017.
- 11 3. This request for an extension of discovery deadlines will not impact the trial date
12 or any other discovery and motion dates in the case and although the parties
13 understand the importance of keeping the Court's timeline, all involved are
14 working together cooperatively and believe the extension will likely result in
15 further settlement discussions, as opposed to having to proceed to trial.
- 16 4. Based on the foregoing, the parties jointly stipulate and request that the Court
17 continue the current discovery cut-off date from July 14, 2017 to September 14,
18 2017.

19
20 **IT IS SO STPULATED**

21 DATED: May 3, 2017

LAW OFFICES OF ANTHONY E. GOLDSMITH

22
23 By: /s/ Anthony Goldsmith

 Anthony E. Goldsmith

 Attorney for Plaintiff,

 CYNTHIA DE JESUS-EDMUNSON

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

DATED: May 3, 2017

THE DERBY LAW FIRM

By: /s/ Steven Derby
Steven Derby
Attorney for Plaintiff,
CYNTHIA DE JESUS-EDMUNSON

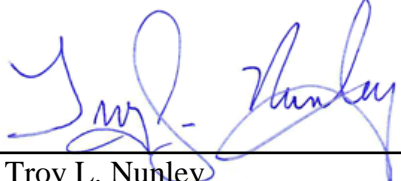
DATED: May 3, 2017

**SACRAMENTO CITY ATTORNEY'S
OFFICE**

By: /s/ Katherine Underwood
Katherine E. Underwood
Attorney for Defendant,
CITY OF SACRAMENTO

**THE STIPULATION OF THE PARTIES IS APPROVED AND IT IS SO
ORDERED.**

Dated: May 05, 2017



Troy L. Nunley
United States District Judge