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17 Attorney for Defendant

18 **UNITED STATES DISTRICT COURT**  
 19 **FOR THE EASTERN DISTRICT OF CALIFORNIA**

20 ROBERT OLVERA SR., an individual,

21 Plaintiff,

22 vs.

23 CITY OF MANTECA, a municipal corporation;  
 24 BEN CROMWELL, individually and in his  
 25 capacity as an officer for the MANTECA Police  
 26 Department; and DOES 1-25, inclusive,  
 27 individually, jointly and severally,  
 28 Defendants.

CASE NO.: 2:15-cv-00897-TLN-DAD

**STIPULATION AND ORDER FOR  
 LEAVE TO RESET THE DATES FOR  
 DISCOVERY CUT-OFF AND EXPERT  
 DISCLOSURE**

Plaintiff, through attorneys of record, JAMES COOK and BEN NISENBAUM, Law Offices  
 of John Burris; and Defendants, CITY OF MANTECA, et al., by and through attorneys of record  
 DALE ALLEN and KEVIN ALLEN of Allen, Glaessner, Hazelwood & Werth, represent to the Court  
 as follows:

1           1.       The parties respectfully request that the Court vacate the existing Discovery Cut-Off  
2 date of May 6, 2016 and reset the date for July 14, 2016.

3           2.       The parties respectfully request that the Court vacate the existing Expert Disclosure  
4 Due date set for July 7, 2016 and reset the date for August 8, 2016.

5           3.       The parties respectfully request that the Court set the deadline to complete Rebuttal  
6 Expert Disclosure to August 22, 2016.

7           4.       The parties respectfully request that the Court set the deadline to complete Expert  
8 Discovery to September 23, 2016.

9           5.       The parties respectfully request the Court Order this Stipulation.  
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12  
13 Dated: April 4, 2016

**THE LAW OFFICES OF JOHN L. BURRIS**

/s/James Cook

James Cook  
Attorney for Plaintiff

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18 Dated: April 4, 2016

**ALLEN, GLAESSNER, HAZELWOOD & WERTH**

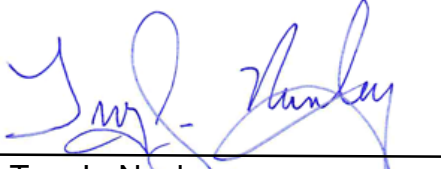
/s/Dale Allen Jr.

Dale Allen Jr.  
Attorney for Defendants

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23 **ORDER**

24 Good cause appearing the Stipulation is SO ORDERED.

25  
26 Dated: April 4, 2016

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Troy L. Nunley  
United States District Judge