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 11 City of Fairfield, Fairfield Police Department,
 12 Rebecca Belk and Michael Ambrose

13 UNITED STATES DISTRICT COURT

14 EASTERN DISTRICT OF CALIFORNIA

15 JEROME HILL,

16 Plaintiff,

17 vs.

18 FAIRFIELD POLICE DEPARTMENT; CITY
 19 OF FAIRFIELD, a municipal corporation;
 20 REBECCA BELK, individually and as a Police
 21 Officer for the CITY OF FAIRFIELD;
 22 MICHAEL AMBROSE, individually and as a
 23 Police Officer for the CITY OF FAIRFIELD;
 24 and DOES 1-50,

25 Defendants.

Case No. 2:15-cv-01820-MCE-KJN

**STIPULATION AND ORDER TO EXTEND TIME
 FOR NON-EXPERT DISCOVERY**

Hon. Morrison C. England, Jr.

26 Plaintiff JEROME HILL and Defendants FAIRFIELD POLICE DEPARTMENT, CITY OF
 27 FAIRFIELD, REBECCA BELK, and MICHAEL AMBROSE by and through their counsel of record,
 28 hereby represent to the Court as follows:

On March 7, 2016, this Court issued a Pretrial Scheduling Order setting, among other deadlines, a
 cutoff for fact discovery of December 12, 2016.

The parties have made progress in discovery, including exchanging written discovery, deposing

1 and scheduling depositions of the parties and a witness officer, completing a medical IME of plaintiff,
2 and setting a psychiatric IME for January 13, 2017.

3 The volume of discovery required, and the schedules of counsel have limited the ability of the
4 parties to complete all necessary fact discovery by the set deadline. A 90-day extension of time will
5 allow the parties adequate time to conduct full and complete discovery in this case.

6 Therefore, the parties request that the non-expert discovery cutoff now set for December 12, 2016
7 be continued by 90 days to March 13, 2017.

8 IT IS SO STIPULATED:

9 Dated: December 9, 2016

BERTRAND, FOX, ELLIOT, OSMAN & WENZEL

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11 By: /s/Parry A. Black
12 Gregory M. Fox
13 Parry A. Black
14 Attorneys for Defendants
City of Fairfield, Fairfield Police Department,
Rebecca Belk and Michael Ambrose

15 Dated: December 9, 2016

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17 By: /s/ Paul Alaga
18 Lewis Romero
19 Paul Alaga
20 Attorneys for Plaintiff
Jerome Hill

21 IT IS SO ORDERED.

22 Dated: January 10, 2017

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25 MORRISON C. ENGLAND, JR.
26 UNITED STATES DISTRICT JUDGE
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