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 7
 8 UNITED STATES DISTRICT COURT
 9 FOR THE EASTERN DISTRICT OF CALIFORNIA

11 JEROME HILL

Case No. 15-cv-01820 HSG

12 Plaintiff,

13 vs.

14 **STIPULATION TO EXTEND TIME FOR
EXPERT DISCOVERY**

15 FAIRFIELD POLICE DEPARTMENT; CITY
 OF FAIRFIELD, a municipal corporation;
 16 REBECCA BELK, individually and in her
 official capacity as a Police Officer for the CITY
 17 OF FAIRFIELD; MICHAEL AMBROSE,
 18 individually and in his official capacity as a
 Police Officer for the CITY OF FAIRFIELD;
 19 and DOES 1-50,

ORDER

Date Action filed: May 28, 2015
Trial Date: Not Set

20 Defendants.

21 _____ /
 22 Plaintiff JEROME HILL and Defendants FAIRFIELD POLICE DEPARTMENT, CITY OF
 23 FAIRFIELD, REBECCA BELK, and MICHAEL AMBROSE by and through counsel, hereby
 24 stipulate and represent to the court the following.

- 25 1) That on March 7, 2016 this Court issued a scheduling order setting, *inter alia*, the cutoff for
 26 fact discovery for December 12, 2016 and the cutoff for expert discovery on February 13, 2017.
 27 2) On January 11, 2017, this Court, upon the request and stipulation of the parties, extended the
 28 cutoff for fact discovery to March 13, 2016.

1 3) The parties have made significant progress in their base discovery, including the depositions
2 of the parties and percipient witnesses.

3 4) The plaintiff and defendant, through counsel, have extensively met and conferred regarding a
4 Defendant request for a Rule 35 psychiatric and psychological exam of plaintiff. Although the
5 parties have met and conferred in good faith, they have not been able to reach accord as to certain
6 terms of the proposed exam.

7 5) The volume of the expert discovery required has limited the parties' ability to complete all the
8 necessary expert discovery within the deadline set. A 90-day extension of time will allow the parties
9 adequate time to conduct full and complete discovery in this case.

10 6) Extending the deadline for expert discovery will not impact any other dates previously set by
11 this Court; no trial date has been set.

12 7) Therefore, the parties jointly request that the expert discovery cutoff now set for February 13,
13 2017, be continued to May 14, 2017.

14 IT IS SO STIPULATED.

15 Dated: January 30, 2017

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18 By: /s/ Paul Alaga
19 Ian Kelley
20 Paul Alaga
21 Attorneys for Plaintiff
22 JEROME HILL

BERTRAND, FOX, et al.

By: /s/ Gregory M. Fox
Gregory M. Fox
Parry A. Black
Attorneys for Defendants
CITY OF FAIRFIELD, FAIRFIELD
POLICE DEPARTMENT, REBECCA
BELK, and MICHAEL AMBROSE

23 IT IS SO ORDERED.

24 Dated: February 7, 2017

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27 MORRISON C. ENGLAND, JR.
28 UNITED STATES DISTRICT JUDGE