

1 DALE L. ALLEN, JR., State Bar No. 145279  
dallen@aghwlaw.com  
2 KEVIN P. ALLEN, State Bar No. 252290  
kallen@aghwlaw.com  
3 ALLEN, GLAESSNER, HAZELWOOD & WERTH, LLP  
180 Montgomery Street, Suite 1200  
4 San Francisco, CA 94104  
Telephone: (415) 697-2000  
5 Facsimile: (415) 813-2045

6 Attorneys for Defendants  
CITY OF MANTECA, ARMANDO GARCIA, IAN  
7 OSBORN, PAUL CARMONA and CHRIS S. MRAZ

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA  
SACRAMENTO COURTHOUSE

JOANNE BLIGHT,

Plaintiff,

v.

CITY OF MANTECA, a Municipal  
Corporation, Manteca Police Department  
Detectives ARMANDO GARCIA,  
Individually, RANCH JOHNSON,  
Individually, KIRK DOTY, Individually,  
MIKE KEENER, Individually, IAN  
OSBORN, Individually, and ARMEN  
AVAKIAN, Individually, Manteca Police  
Department Sergeants PAUL CARMONA  
and CHRIS S. MRAZ, in their Individual  
and Supervisory capacities, and DOES 1  
THROUGH 60, Jointly and Severally,

Defendants.

Case No.: 2:15-cv-02513-WBS-AC

**STIPULATION RE: SUMMARY JUDGMENT  
DEADLINES; [~~PROPOSED~~] ORDER**

**TO THE CLERK OF THE COURT, ALL PARTIES, AND THEIR ATTORNEYS**

**OF RECORD:**

Plaintiff JOANNE BLIGHT (“Plaintiff”) and Defendants CITY OF MANTECA,  
ARMANDO GARCIA, IAN OSBORN, CHRIS MRAZ, and PAUL CARMONA (“Defendants”)  
are hereby respectfully requesting continuance of the existing hearing date (9/18/17) so that  
Defendants have additional time to complete the Reply. The parties request October 16, 2017

1 (which they understand is the next available hearing date). Defendants agree to waive Local Rule  
2 230(d); their Reply would be Monday, September 18, 2017.

3 **I. GOOD CAUSE**

4 The record in this matter is voluminous, and Plaintiff's combined statement of  
5 facts/opposition brief is lengthy. Despite defense counsel's best efforts, the Reply cannot be  
6 completed by the September 11th deadline.<sup>1</sup> In view of the length of Plaintiff's opposition brief  
7 and separate statement of facts (combined into one document), Plaintiff does not object to  
8 Defendants' request.

9 Based on the foregoing circumstances, by and through their respective counsel of record,  
10 the parties hereby stipulate, and respectfully request that the briefing schedule relating to  
11 Defendants' motion for summary judgment/adjudication and, as a result, the hearing date on  
12 Defendants' motion, be continued and modified, as follows:

- 13 1. That the hearing date for Defendants' Motion for Summary  
14 Judgment/Adjudication be continued from September 18, 2017 to October 16, 2017 at 1:30 p.m.
- 15 2. Defendants' deadline to file their Reply is September 18, 2017 by Noon (12:00  
16 p.m.)

17  
18 Respectfully submitted,

19 Dated: September 7, 2017

LAW OFFICES OF SANJAY S. SCHMIDT

20  
21 By: /s/ Sanjay S. Schmidt  
22 SANJAY S. SCHMIDT  
23 Attorneys for Plaintiff  
24 JOANNE BLIGHT

25  
26  
27 \_\_\_\_\_  
28 <sup>1</sup> If the Court would like the parties to provide additional facts supporting their request, that can be provided.

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: September 7, 2017

ALLEN, GLAESSNER,  
HAZELWOOD & WERTH, LLP

By: /s/ Kevin P. Allen  
DALE L. ALLEN, JR.  
KEVIN P. ALLEN  
Attorneys for Defendants  
CITY OF MANTECA, ARMANDO  
GARCIA, IAN OSBORN, PAUL CARMONA  
and CHRIS S. MRAZ

**PURSUANT TO THE FOREGOING STIPULATION, IT IS SO ORDERED.**

Dated: September 7, 2017

  
WILLIAM B. SHUBB  
UNITED STATES DISTRICT JUDGE