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15 *Attorneys for Plaintiff,*
 16 JOANNE BLIGHT

17 **UNITED STATES DISTRICT COURT**

18 **EASTERN DISTRICT OF CALIFORNIA – SACRAMENTO DIVISION**

19	JOANNE BLIGHT,)	Case No. 2:15-cv-02513-WBS-AC
)	
20	Plaintiff,)	STIPULATION & [PROPOSED]
)	ORDER TO EXTEND DISCOVERY
21	vs.)	DEADLINE
)	
22	CITY OF MANTECA, a Municipal)	
	Corporation, Manteca Police Department)	
23	Detectives ARMANDO GARCIA,)	
	Individually, RANCH JOHNSON,)	
24	Individually, KIRK DOTY, Individually,)	
	MIKE KEENER, Individually, IAN)	
25	OSBORN, Individually, and ARMEN)	
	AVAKIAN, Individually, Manteca Police)	

1 Department Sergeants **PAUL CARMONA**)
2 and **CHRIS S. MRAZ**, in their Individual and)
3 Supervisory capacities, and **DOES 1**)
4 **THROUGH 60**, Jointly and Severally,)
5 Defendants.)

6 **TO THE CLERK OF THE COURT, ALL PARTIES, AND THEIR ATTORNEYS**
7 **OF RECORD:**

8 In its Scheduling Order (Dkt. 8), the Court set various deadlines, which includes a
9 discovery completion date of January 10, 2017. The parties indicated in their recently filed
10 stipulation to extend the deadline for expert disclosures that, depending on the circumstances of
11 the pending discovery related to the CI, they anticipated possibly submitting a request to extend
12 the discovery deadline. (Dkt. 27, at p. 2, footnote 1.)

13 Since discovery in this action commenced, the parties have diligently conducted written
14 discovery and depositions. To date, written discovery has been exchanged, thirteen depositions
15 have been conducted, expert disclosures have been made, and some additional depositions to
16 address discovery that was the subject of the parties' recently litigated discovery disagreement
17 are on calendar. Nonetheless, as a result of the delays that are inherent in addressing the
18 unusual discovery issues involved with this case – and in order to try to the extent possible to
19 accommodate counsels' and the deponents' calendars – it is necessary to extend the discovery
20 cutoff in this case. For the time being, the parties are hoping that the extension requested in this
21 stipulation will allow sufficient time for the completion of discovery in this case, and the
22 parties are going to work diligently to accomplish this. The undersigned counsel for Plaintiff
23 notes, however, that as of the submission of this stipulation, the CI phase of discovery in this
24 case has not yet commenced, so Plaintiff's counsel does not yet know whether this is going to
25 trigger the need for additional discovery and possibly additional motion practice. Defendants'
counsel believes these additional 30 days are sufficient to complete discovery.

Based on the foregoing circumstances, the parties respectfully stipulate to and request

1 an Order from the Court for the following:

- 2 1. That the deadline for the completion of all discovery be extended by 30-days,
- 3 from January 10, 2017, to February 9, 2017; and,
- 4 2. That all other dates and deadlines remain as set for the time being.

5
6 Respectfully submitted,

7 Dated: December 9, 2016

LAW OFFICE OF SANJAY S. SCHMIDT

8 By: /s/ Sanjay S. Schmidt
9 SANJAY S. SCHMIDT
10 Attorneys for Plaintiff
11 JOANNE BLIGHT

12 Dated: December 9, 2016

ALLEN, GLAESSNER,
HAZELWOOD & WERTH, LLP

13 By: /s/ Kevin P. Allen¹
14 DALE L. ALLEN, JR.
15 KEVIN P. ALLEN
16 Attorneys for Defendants
17 CITY OF MANTECA, ARMANDO
18 GARCIA, RANCH JOHNSON, KIRK
19 DOTY, MIKE KEENER, IAN OSBORN,
20 ARMEN AVAKIAN, PAUL CARMONA
21 and CHRIS S. MRAZ

22 **PURSUANT TO THE FOREGOING STIPULATION, AND ¶ IX OF THE STATUS**
23 **(PRETRIAL SCHEDULING) ORDER (ECF # 8), IT IS SO ORDERED.**

24 DATED: December 12, 2016

25 Allison Claire
ALLISON CLAIRE
UNITED STATES MAGISTRATE JUDGE

¹ Pursuant to Local Rule 131(e), counsel has authorized the submission of this document on counsel's behalf.