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10 Attorneys for Defendants  
 11 CITY OF MANTECA, ARMANDO GARCIA, RANCH  
 12 JOHNSON, KIRK DOTY, MIKE KEENER, IAN  
 13 OSBORN, ARMEN AVAKIAN, PAUL CARMONA and  
 14 CHRIS S. MRAZ

10 UNITED STATES DISTRICT COURT  
 11 EASTERN DISTRICT OF CALIFORNIA  
 12 SACRAMENTO COURTHOUSE

13 JOANNE BLIGHT,

14 Plaintiff,

15 v.

16 CITY OF MANTECA, a Municipal  
 17 Corporation, Manteca Police Department  
 18 Detectives ARMANDO GARCIA,  
 19 Individually, RANCH JOHNSON,  
 20 Individually, KIRK DOTY, Individually,  
 21 MIKE KEENER, Individually, IAN  
 22 OSBORN, Individually, and ARMEN  
 23 AVAKIAN, Individually, Manteca Police  
 24 Department Sergeants PAUL CARMONA  
 25 and CHRIS S. MRAZ, in their Individual  
 26 and Supervisory capacities, and DOES 1  
 27 THROUGH 60, Jointly and Severally,

28 Defendants.

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

**STIPULATION RE: EXCUSAL FROM  
LOCAL RULE 251; [PROPOSED] ORDER**

ALLEN, GLAESSNER, HAZELWOOD & WERTH, LLP  
 180 Montgomery Street, Suite 1200  
 San Francisco, California 94104

1           **TO THE CLERK OF THE COURT, ALL PARTIES, AND THEIR ATTORNEYS**  
2           **OF RECORD:**

3           The parties have a pending discovery matter scheduled for hearing on February 8, 2017.  
4 (Dkt. No. 41). Pursuant to Local Rule 251(c), the parties are to submit a Joint Statement. The  
5 parties have met-and-conferred, and believe a joint statement is impractical due to the various  
6 redactions and sealed documents that will be submitted by each side. A joint filing creates a  
7 logistical hurdle and heavy burden for the parties. The parties both agree Separate Statements  
8 would be more feasible, and respectfully request this one-time excusal from Local Rule 251.

9           By and through the counsel of record for Defendants and Plaintiff, the parties stipulate as  
10 follows:

- 11           1.       The parties are excused from filing a Joint Statement under Local Rule 251(c);
- 12           2.       The parties are permitted to file Separate Statements for the instant discovery  
13 dispute.

14       Respectfully submitted,

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16       Dated: January 31, 2017

LAW OFFICES OF SANJAY S. SCHMIDT

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18       By:           /s/ Sanjay S. Schmidt            
          SANJAY S. SCHMIDT  
          Attorneys for Plaintiff  
          JOANNE BLIGHT

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21       Dated: January 31, 2017

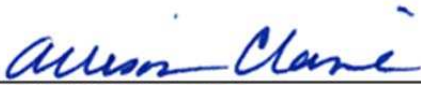
ALLEN, GLAESSNER,  
HAZELWOOD & WERTH, LLP

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24       By:           /s/ Kevin P. Allen            
          DALE L. ALLEN, JR.  
          KEVIN P. ALLEN  
          Attorneys for Defendants  
          CITY OF MANTECA, ARMANDO  
          GARCIA, RANCH JOHNSON, KIRK DOTY,  
          MIKE KEENER, IAN OSBORN, ARMEN  
          AVAKIAN, PAUL CARMONA and CHRIS  
          S. MRAZ

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

DATED: February 1, 2017

  
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ALLISON CLAIRE  
UNITED STATES MAGISTRATE JUDGE

ALLEN, GLAESSNER, HAZELWOOD & WERTH, LLP  
180 Montgomery Street, Suite 1200  
San Francisco, California 94104