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16
 17 **UNITED STATES DISTRICT COURT**
 18 **EASTERN DISTRICT OF CALIFORNIA**

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|----|-----------------------------------|---|-------------------------------------|
| 19 | | | |
| 20 | GUILLERMO BONILLA-CHIRINOS, |) | Case No.: 2:15-cv-02564-WBS-EFB |
| 21 | SANDRA HERNANDEZ, INDIVIDUALLY |) | |
| 22 | AND AS GUARDIANS AD LITEM OF J B, |) | |
| 23 | A MINOR |) | STIPULATION AND [PROPOSED] |
| 24 | |) | ORDER MODIFYING THE PRETRIAL |
| 25 | |) | SCHEDULING ORDER TO TAKE TWO |
| 26 | |) | DEPOSITIONS BEYOND THE |
| 27 | |) | DISCOVERY CUT-OFF DATE |
| 28 | |) | |
| | Plaintiffs, |) | |
| | vs. |) | |
| | |) | |
| | CITY OF WEST SACRAMENTO, |) | |
| | KENNETH FELLOWS (BADGE #151) AND |) | |
| | DOES 1 THROUGH 99, |) | |
| | |) | |
| | Defendants. |) | |
| | |) | |

1 COMES NOW THE PARTIES by and through their respective counsel and subject to the
2 approval of this Court, hereby stipulate and respectfully request the following modification to
3 this Court's Pretrial Scheduling Order of November 17, 2016 (Court's Docket No. 25): that the
4 depositions of Plaintiffs Guillermo Bonilla-Chirinos and Sandra Hernandez be taken by
5 Defendants beyond the current discovery cut-off date of April 21, 2017.

6 There is good cause for this modification as follows: the depositions of Plaintiffs
7 Guillermo Bonilla-Chirinos and Sandra Hernandez were originally scheduled before the
8 discovery cut-off date of April 21, 2017. Plaintiff Sandra Hernandez's deposition was originally
9 scheduled on April 17, 2017 and Plaintiff Guillermo Bonilla-Chirinos' deposition was originally
10 scheduled on April 18, 2017. However, those dates became unavailable to said Plaintiffs due to
11 employment matters and other matters, and Plaintiffs requested that their depositions be re-
12 scheduled to April 27, 2017 (Plaintiff Guillermo Bonilla-Chirinos) and to April 28, 2017
13 (Plaintiff Sandra Hernandez). Defendants agreed to the new dates subject to the Court's approval
14 of Plaintiffs' depositions being taken beyond the discovery cut-off date of April 21, 2017.

15 The parties therefore have respectfully submitted this Stipulation and Order requesting
16 the Court to approve Plaintiffs' depositions being taken beyond the discovery cut-off date of
17 April 21, 2017.

18 Dated: April 17, 2017

ANGELO, KILDAY & KILDUFF, LLP

19 /s/ Sean D. O'Dowd

20 By: _____

21 AMIE McTAVISH

22 SEAN D. O'DOWD

Attorneys for Defendants

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24 Dated: April 13, 2017

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CORPORATION

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26 By: _____ /s/ Cyrus Zal

27 CYRUS ZAL

28 Attorney for Plaintiffs

ORDER

1 Good cause appearing, the parties' stipulation is approved as modified herein.
2 Accordingly, it is ordered that the discovery cutoff date of April 21, 2017, is hereby extended for
3 the limited purpose of allowing for the completion of the depositions of Guillermo Bonilla-
4 Chirinos and Sandra Hernandez. Therefore, the depositions previously noticed for April 17 and
5 18, 2017, are hereby ordered reset for April 27 and 28, 2017, respectively.
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8 **IT IS SO ORDERED.**

9 Dated: April 17, 2017.


EDMUND F. BRENNAN
UNITED STATES MAGISTRATE JUDGE

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