

WELCH LAW FIRM  
300 Harding Boulevard, Suite 109  
Roseville, CA 95678

1 Dominick R. Welch (SBN 311096)  
WELCH LAW FIRM  
2 300 Harding Boulevard, Suite 109  
Roseville, CA 95678  
3 Telephone: (916) 865-4149  
Facsimile: (916) 865-4267  
4 Dom@Welch-LawFirm.com

5 Attorney for Plaintiff,  
TIO DINERO SESSOMS  
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8 **UNITED STATES DISTRICT COURT**  
9 **EASTERN DISTRICT OF CALIFORNIA**

10 TIO DINERO SESSOMS,

11 Plaintiff,

12 v.

13 JOHN PATRICK KELLER, et al.,

14 Defendants.  
15

Case No.: 2:16-cv-01943-WBS-EFB

**JOINT STIPULATION AND [PROPOSED]  
ORDER TO MODIFY DISCOVERY AND  
SCHEDULING ORDER**

Complaint Filed: August 18, 2016  
FAC Filed: June 20, 2017

16 Plaintiff, TIO DINERO SESSOMS (“Plaintiff”) and Defendants JOHN PATRICK  
17 KELLER and DICK WOODS (“Defendants”), through their respective undersigned counsel,  
18 hereby respectfully submit the following Joint Stipulation and [Proposed] Order to Modify the  
19 Court’s October 10, 2018, DISCOVERY AND SCHEDULING ORDER.

20 **STIPULATION**

21 WHEREAS, the Court issued a Discovery and Scheduling Order on October 9, 2018, and  
22 filed October 10, 2018. (ECF Doc No. 59.)

23 WHEREAS, the Court’s Discovery and Scheduling Order, dated October 9, 2018, requires  
24 the parties to complete discovery investigation by February 15, 2019.

25 WHEREAS, Plaintiff’s counsel, Dominick R. Welch, entered as attorney of record on  
26 January 31, 2019.

27 WHEREAS, the current Discovery and Scheduling Order does not allow the parties time  
28 to complete discovery. Furthermore, the parties are continuing to meet and confer regarding

1 responses to written discovery from Defendants’ Special Interrogatories and Request for  
2 Production of Documents, which includes seven separate document requests.

3 WHEREAS, the parties agree that good cause exists to extend all remaining deadlines in  
4 the Court’s Discovery and Scheduling Order, dated October 9, 2018 (ECF Doc No. 59), as follows:

EVENT	CURRENT DATE	NEW DATE
Discovery Requests Deadline	December 14, 2018 [Discovery and Scheduling Order (“D&SO”), ECF Doc No. 59, pp. 4:13.]	April 19, 2019
Discovery Cut-Off Deadline	February 15, 2019 (D&SO, ECF Doc No. 59, pp. 4:15.)	June 21, 2019
Deadline to File Motion to Amend Complaint	February 15, 2019 (D&SO, ECF Doc No. 59, pp. 4:17.)	June 21, 2019
Deadline to File Dispositive Motions	May 17, 2019 (D&SO, ECF Doc No. 59, pp. 4:18.)	September 20, 2019

16 Dated: February 13, 2019

WELCH LAW FIRM

18 /s/ Dominick R. Welch

Dominick R. Welch  
Attorney for Plaintiff,  
TIO DINERO SESSOMS

20 Dated: February 13, 2019

CITY OF SACRAMENTO

22 /s/ Andrea M. Velasquez

Andrea M. Velasquez  
Attorney for Defendants,  
JOHN PATRICK KELLER and DICK  
WOODS

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**[PROPOSED] ORDER**

The Court, having reviewed the JOINT STIPULATION TO MODIFY DISCOVERY AND SCHEDULING ORDER and finding good cause, issues an Order to:

1. Continue the deadline to propound discovery from December 14, 2018, to April 19, 2019;
2. Continue the discovery cut-off from February 15, 2019, to June 21, 2019;
3. Continue the deadline to file a Motion to Amend the Complaint from February 15, 2019, to June 21, 2019; and
4. Continue the deadline to file Dispositive Motions from May 17, 2019, to September 20, 2019.

**IT IS SO ORDERED.**

Dated: February 21, 2019



EDMUND F. BRENNAN  
U.S. MAGISTRATE JUDGE