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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,

14 Defendant.
15

Case No.: 2:17-cv-00304-WBS-EFB

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

Complaint Filed: February 14, 2017
FAC Filed: August 8, 2017

16 Plaintiff, TIO DINERO SESSOMS (“Plaintiff”) and Defendant JOHN PATRICK
17 KELLER (“Defendant”), through their respective undersigned counsel, hereby respectfully submit
18 the following Joint Stipulation and [Proposed] Order to Modify the Court’s October 30, 2018,
19 AMENDED DISCOVERY AND SCHEDULING ORDER.

20 **STIPULATION**

21 WHEREAS, the Court issued a Discovery and Scheduling Order on September 27, 2018,
22 filed September 28, 2018 (ECF Doc No. 24), as modified by the Court’s subsequent October 30,
23 2018, filed October 31, 2018 (ECF Doc No. 27).

24 WHEREAS, the Court’s Amended Discovery and Scheduling Order, dated October 30,
25 2018, requires the parties to complete discovery investigation by March 15, 2019.

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

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1 WHEREAS, the current Discovery and Scheduling Order does not allow the parties time
2 to complete discovery. Furthermore, the parties are continuing to meet and confer regarding
3 responses to written discovery from Defendants' Special Interrogatories and Request for
4 Production of Documents, which includes five separate document requests.

5 WHEREAS, the parties agree that good cause exists to extend all remaining deadlines in
6 the Court's Amended Discovery and Scheduling Order, dated October 30, 2018 (ECF Doc No.
7 27), as follows:

EVENT	CURRENT DATE	NEW DATE
Discovery Requests Deadline	January 11, 2019 [Discovery and Scheduling Order ("D&SO"), ECF Doc No. 27, pp. 4:15.]	April 25, 2019
Discovery Cut-Off Deadline	March 15, 2019 (D&SO, ECF Doc No. 27, pp. 4:13.)	June 27, 2019
Deadline to File Motion to Amend Complaint	March 15, 2019 (D&SO, ECF Doc No. 27, pp. 4:17.)	June 27, 2019
Deadline to File Dispositive Motions	June 14, 2019 (D&SO, ECF Doc No. 27, pp. 4:18.)	September 26, 2019

19 Dated: February 13, 2019

WELCH LAW FIRM

/s/ Dominick R. Welch

Dominick R. Welch
Attorney for Plaintiff,
TIO DINERO SESSOMS

23 Dated: February 13, 2019

CITY OF SACRAMENTO

/s/ Andrea M. Velasquez

Andrea M. Velasquez
Attorney for Defendant,
JOHN PATRICK KELLER

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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 January 11, 2019, to April 25, 2019;
2. Continue the discovery cut-off from March 15, 2019, to June 27, 2019;
3. Continue the deadline to file a Motion to Amend the Complaint from March 15, 2019, to June 27, 2019; and
4. Continue the deadline to file Dispositive Motions from June 14, 2019, to September 26, 2019.

IT IS SO ORDERED.

Dated: February 21, 2019



EDMUND F. BRENNAN
U.S. MAGISTRATE JUDGE