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9 Attorneys for the CITY OF SACRAMENTO POLICE DEPARTMENT and POLICE
10 OFFICER PATRICK MULLIGAN

11 UNITED STATES DISTRICT COURT
12 EASTERN DISTRICT OF CALIFORNIA

13 CANDIDA JOHNSON,
14 Plaintiff,

15 vs.

16 CITY OF SACRAMENTO POLICE
17 DEPARTMENT; POLICE OFFICER
18 PATRICK MULLIGAN; and DOES 1
19 through 25, inclusive,
20 Defendants.

Case No.: 2:18-cv-00639-MCE-KJN

**STIPULATION AND ORDER TO
EXTEND DISCOVERY CUT-OFF**

21 TO: THE HONORABLE MAGISTRATE JUDGE KENDALL J. NEWMAN

22 IT IS HEREBY STIPULATED between the parties, by and through their respective
23 counsel of record that the discovery cut-off be extended.

24 The parties are in the process of meeting and conferring on discovery issues and need
25 additional time to complete discovery and have only recently discovered the identity of
26 potentially relevant witnesses that were disclosed in Supplemental Rule 26 Disclosures.

27 The parties further stipulate and agree that any additional discovery will be related to
28 depositions only and not to additional written discovery.

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1 It is stipulated between the parties, that the following cutoff dates be set:

2 FACT DISCOVERY CUT-OFF: 07-15-2019

3 EXPERT DISCOVERY CUTOFF: 09-15-2019

4 DATED: April 2, 2019

LAW OFFICES OF JOSE R. VALDEZ

6 By: /s/ JOSE R. VALDEZ

7 **JOSE R. VALDEZ**

8 Attorneys for Plaintiff, CANDIDA
9 JOHNSON

10 DATED: April 2, 2019

KRAVITZ LAW OFFICE

12 By: /s/ JEFFREY S. KRAVITS

13 **JEFFREY S. KRAVITZ**

14 Attorneys for Plaintiff, CANDIDA
15 JOHNSON

16 DATED: April 2, 2019

SUSANA ALCALA WOOD
17 City Attorney

19 By: /s/ SEAN D. RICHMOND

20 **SEAN D. RICHMOND**

Senior Deputy City Attorney

21 Attorneys for the CITY OF SACRAMENTO
22 POLICE DEPARTMENT and POLICE
23 OFFICER PATRICK MULLIGAN


24 I, Sean D. Richmond, certify that I have permission to affix the signatures of Jeffrey S.
25 Kravitz and Jose R. Valdez to this document by email permission.
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ORDER

Good cause appearing, IT IS SO ORDERED.

Dated: April 3, 2019



KENDALL J. NEWMAN
UNITED STATES MAGISTRATE JUDGE