<ul> <li>SUSANA ALCALA WOOD, City Attorney (SBN 156366)</li> <li>SEAN D. RICHMOND, Senior Deputy City Attorney (SBN 210138)</li> <li>srichmond@cityofsacramento.org</li> </ul>			
srichmond@cityofsacramento.org			
CITY OF SACRAMENTO 915 I Street, Room 4010			
4 Sacramento, CA 95814-2608 Telephone: (916) 808-5346			
5    Telecopier: (916) 808-7455			
<ul> <li>Attorneys for the CITY OF SACRAMENTO, JOHN HARSHBARGER AND DAN</li> <li>FARNSWORTH</li> </ul>	EL		
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9 UNITED STATES DISTRICT COURT			
EASTERN DISTRICT OF CALIFORNIA			
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12   KRISTOPHER VELEZ,   Case No.: 2:18-cv-01914-MCE-C			
Plaintiff,   STIPULATION AND ORDER TO EXTEND DISCOVERY CUT-OR			
14 vs.			
15 CITY OF SACRAMENTO; JOHN			
16 HARSHBARGER; BAIL HOTLINE BAIL BONDS, INC.; AMERICAN SURETY			
17 COMPANY; and DOES 1 through 25, inclusive,			
18			
19 Defendants.			
20 IT IS HEREBY STIPULATED between the parties, by and through their res	pective		
21 counsel of record that the discovery cut-off be extended.			
22 The parties are in the process of meeting and conferring on discovery issues an	d need		
23 additional time to complete discovery. In addition, Plaintiff may undergo further r	nedical		
24 treatment that may have bearing on discovery and how the parties proceed with the ca	se.		
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STIPULATION AND ORDER TO EXTEND DISCOVERY CUT-OFF	ockets.Ju		

1	It is stipulated between the parties, that the following cutoff dates be set:
2	FACT DISCOVERY CUT-OFF: March 16, 2020
3	EXPERT WITNESS DESIGNATION: May 15, 2020
4	DATED: October 7, 2019 SUSANA ALCALA WOOD,
5	City Attorney
6	
7	By: /s/ SEAN D. RICHMOND
8	SEAN D. RICHMOND Senior Deputy City Attorney
9 10	Attorneys for the CITY OF SACRAMENTO, JOHN HARSHBARGER, AND DANIEL FARNSWORTH
11	
12	DATED:, 2019 LAW OFFICE OF STEWART KATZ
13	
14	
15	By: <u>/s/ STEWART KATZ</u> STEWART KATZ
16	Attorneys for Plaintiff, KRISTOPHER VELEZ
17	
18	DATED:, 2019 LEWIS BRISBOIS BISGAARD & SMITH LLP
19	
20	
21	By: <u>/s/ ANDREW BLUTH</u> ANDREW BLUTH
22	Attorneys for BAIL HOTLINE BAIL BONDS,
23	INC., AMERICAN SURETY COMPANY
24	
25	I, Sean D. Richmond, certify that I have permission to affix the signatures of Stewart
26	Katz and Andrew Bluth to this document by email permission.
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	STIPULATION AND ORDER TO EXTEND DISCOVERY CUT-OFF

1	<u>ORDER</u>
2	Based on the stipulation of the parties to this action, and good cause appearing therefore,
3	IT IS HEREBY ORDERED that:
4	1. Fact Discovery Cut-Off be extended to March 16, 2020; and
5	2. Expert Witness Designation be extended to May 15, 2020.
6	IT IS SO ORDERED.
7	Dated: October 9, 2019
8	Moun Il i.
9	MORRISON C. ENGLAND, JR UNITED STATES DISTRICT JUDGE
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	3 STIPULATION AND ORDER TO EXTEND DISCOVERY CUT-OFF
	511FULATION AND ORDER TO EXTEND DISCOVERY CUT-OFF