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14 Attorneys for Defendants  
15 CITY OF VALLEJO, ANDREW BIDOU, MARK  
THOMPSON, BRYAN GLICK, ANTHONY ROMERO-  
16 CANO, COLIN EATON, JORDON PATZER, STEVEN  
DARDEN, AND KYLE WYLIE

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

20 KORI MCCOY, etc., et al.,  
21  
22 Plaintiffs,  
23 v.  
24 CITY OF VALLEJO, etc., et al.,  
25 Defendants.

**CASE NO.: 2:19-cv-01191-JAM-CKD**  
**STIPULATION AND [PROPOSED] ORDER**  
**CONTINUING HEARING ON PLAINTIFFS'**  
**MOTION TO COMPEL DISCOVERY**  
Complaint Filed: June 27, 2019  
SAC Filed: March 26, 2021  
Trial Date: January 30, 2023  
Discovery Cut-off: June 3, 2022  
Motion Cut-off: July 15, 2022

1 IT IS HEREBY STIPULATED by and between the Plaintiffs Kori McCoy, Marc McCoy,  
2 Louis McCoy, Shawnmell Mitchell, Marquita McCoy, and Barbara Dorsey (“Plaintiffs”) and  
3 Defendants City of Vallejo, Andrew Bidou, Mark Thompson, Bryan Glick, Anthony Romero-Cano,  
4 Colin Eaton, Jordon Patzer, Steven Darden, Kyle Wylie and Ryan McMahon (“Defendants”),  
5 referred to collectively as the “Parties,” by and through their designated counsel, that:

6 WHEREAS, on November 1, 2021, Plaintiffs filed with this Court a Notice of Discovery  
7 Dispute and Motion to Compel Disclosures pursuant to Local Rule 251, to be heard on December 1,  
8 2021, at 10:00 A.M. before the Honorable Magistrate Judge Carolyn K. Delaney, in the United  
9 States District Court, Eastern District of California, Robert T. Matsui United States Courthouse, 500  
10 I Street, Sacramento, California 95814, Courtroom 24, 8<sup>th</sup> Floor (via Zoom). The motion arises out  
11 of a discovery dispute between the Plaintiffs and the City.

12 WHEREAS, in accordance with Local Rule 251, the Plaintiffs and Defendants are required  
13 to file a Joint Statement Re Discovery Disagreement by no later than November 24, 2021, in order  
14 for the motion to remain on calendar.

15 WHEREAS, this date falls on a week during which the Thanksgiving holidays will occur and  
16 several people (especially employees of public agencies like Defendant City) typically take, and will  
17 be on, vacation throughout the week. Accordingly, availability for persons through their work  
18 schedules will be more limited during the time that a Joint Statement would need to be prepared and  
19 filed with the Court than nearly every other week of the year.

20 WHEREAS, for these reasons, City has requested that the hearing scheduled for December 1,  
21 2021, be rescheduled to allow an additional two weeks for the Joint Statement to be filed in a timely  
22 manner under Local Rule 251.

23 WHEREAS, counsel of record for City and the Plaintiffs have contacted the Deputy Clerk  
24 and determined that the date of December 15, 2021, is available for a hearing on the motion.

25 NOW THEREFORE, the Parties, through their undersigned counsel below, hereby stipulate  
26 and agree:

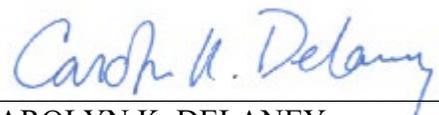
- 27 1. The hearing on Plaintiffs’ motion shall be continued from December 1, 2021, to  
28 December 15, 2021, at 10:00 A.M. before the Honorable Magistrate Judge Carolyn K.

1 Delaney, in the United States District Court, Eastern District of California, Robert T.  
2 Matsui United States Courthouse, 500 I Street, Sacramento, California 95814, Courtroom  
3 24, 8<sup>th</sup> Floor (via Zoom).

4 2. The Parties hereby request the Court to enter the Proposed Order set forth below.

5 **IT IS SO STIPULATED.**

6 **Dated: November 19, 2021**

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8 \_\_\_\_\_  
9 CAROLYN K. DELANEY  
10 UNITED STATES MAGISTRATE JUDGE

11 Colantuono, Highsmith & Whatley, PC  
12 420 SIERRA COLLEGE DRIVE, SUITE 140  
13 GRASS VALLEY, CA 95945-5091  
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1 DATED: November 18, 2021

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/s/ John A. Abaci  
JOHN A. ABACI  
Attorneys for Defendants  
City of Vallejo, Andrew Bidou, Mark Thompson,  
Bryan Glick, Anthony Romero-Cano, Colin Eaton,  
Jordon Patzer, Steven Darden, and Kyle Wylie

6 DATED: November 18, 2021

7

/s/ Patrick M. Buelna  
PATRICK M. BUELNA  
Attorneys for Plaintiffs

10 DATED: November 18, 2021

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/s/ Derick E. Konz  
DERICK E. KONZ  
Attorneys for Defendant Ryan McMahon

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