

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

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

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

**CASE NO.: 2:19-cv-01191-JAM-CKD**

**STIPULATION AND ~~PROPOSED~~ ORDER  
CONTINUING HEARING ON CITY'S  
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 December 28, 2021, all Defendants with the exception of Ryan McMahon,  
7 who is represented by separate counsel (hereinafter referred to as “City”) filed with this Court a  
8 Notice of Motion and Motion to Compel Disclosures pursuant to Local Rule 251, to be heard on  
9 January 19, 2022, at 10:00 A.M. before the Honorable Magistrate Judge Carolyn K. Delaney, in the  
10 United States District Court, Eastern District of California, Robert T. Matsui United States  
11 Courthouse, 500 I Street, Sacramento, California 95814, Courtroom 24, 8<sup>th</sup> Floor (via Zoom). The  
12 motion arises out of a discovery dispute between the City and Plaintiffs.

13 WHEREAS, in accordance with Local Rule 251, the City and Plaintiffs are required to file a  
14 Joint Statement Re Discovery Disagreement by no later than January 12, 2022, in order for the  
15 motion to remain on calendar.

16 WHEREAS, the City and Plaintiffs are in the process of attempting to resolve the motion  
17 informally and believe that they will know whether they will be able to do so if the hearing is  
18 continued for two weeks, to the date of February 2, 2022.

19 WHEREAS, for these reasons, City and Plaintiffs are requesting that the hearing scheduled  
20 for January 19, 2022, be rescheduled to allow an additional two weeks for the City and Plaintiffs to  
21 attempt to work out their differences and enable the Joint Statement to be filed in a timely manner  
22 under Local Rule 251.

23 WHEREAS, counsel of record for City and Plaintiffs have contacted the Courtroom Deputy  
24 and determined that the date of February 2, 2022, 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 City’s motion shall be continued from January 19, 2022, to February 2,  
28 2022, at 10:00 A.M. before the Honorable Magistrate Judge Carolyn K. Delaney, in the

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

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

5 **IT IS SO STIPULATED.**

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DATED: January 7, 2022

/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

DATED: January 7, 2022

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

DATED: January 7, 2022

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

**IT IS SO ORDERED.**

Dated: January 7, 2022

Carolyn K. Delaney  
CAROLYN K. DELANEY  
UNITED STATES MAGISTRATE JUDGE