

1 PATRICK MORIARTY, State Bar No. 213185  
 pmoriarty@cmtrlaw.com  
 2 JOHN B. ROBINSON, State Bar No. 297065  
 jrobinson@cmtrlaw.com  
 3 JOANNE TRAN, State Bar No. 294402  
 jtran@cmtrlaw.com  
 4 CASTILLO, MORIARTY, TRAN & ROBINSON  
 75 Southgate Avenue  
 5 Daly City, CA 94015  
 Telephone: (415) 213-4098

6 Attorneys for Defendants  
 7 CITY OF FAIRFIELD AND ZACHARY SANDOVAL

8 UNITED STATES DISTRICT COURT  
 9 EASTERN DISTRICT OF CALIFORNIA

11 CALVIN RUSH and JAYME RUSH,  
 12 Plaintiff,  
 13 v.  
 14 CITY OF FAIRFIELD, OFFICERS  
 ZACHARY SANDOVAL AND DUSTIN  
 15 JOSEPH,  
 16 Defendants.

Case No. 2:21-cv-01120-WBS-KJN

**STIPULATION AND ORDER TO EXTEND  
 DISCOVERY DEADLINES**

Hon. William B. Shubb

17  
 18 IT IS HEREBY STIPULATED, and respectfully requested, by and between Plaintiffs and  
 19 Defendants by and through their designated counsel, that:

20 WHEREAS, on June 21, 2021, Plaintiffs filed their Complaint. (Doc. 1).

21 WHEREAS, on February 2, 2022, Defendants City of Fairfield and Zachary Sandoval filed  
 22 their Answer. (Doc. 10).

23 WHEREAS, on March 16, 2022, the Court issued the case schedule (Doc. 12);

24 WHEREAS, the current discovery schedule is set as:

25 Designation of Expert Witnesses due by 2/7/2023  
 26 Discovery shall be completed by 4/11/2023  
 Motions shall be filed by 6/20/2023  
 27 Final Pretrial Conference set for 8/28/2023 at 01:30 PM  
 28 Jury Trial set for 10/31/2023

1 WHEREAS, Defendants City of Fairfield and Zachary Sandoval retained new counsel in  
2 January 2023;

3 WHEREAS, expert disclosures are due on February 7, 2023;

4 WHEREAS, discovery shall be completed by April 11, 2023;

5 WHEREAS, newly retained counsel for the City of Fairfield and Zachary Sandoval requires  
6 additional time to review the case and conduct its own discovery;

7 WHEREAS, the parties met and conferred and agreed to extend discovery dates and set  
8 case schedule as proposed below:

- 9 Designation of Expert Witnesses due by 5/1/2023
- 10 Discovery shall be completed by 6/5/2023
- 11 Motions shall be filed by 6/20/2023
- 12 Final Pretrial Conference set for 8/28/2023 at 01:30 PM
- 13 Jury Trial set for 10/31/2023

14 IT IS SO AGREED.

15 Respectfully submitted,

16 Dated: January 11, 2023

17 CASTILLO, MORIARTY,  
18 TRAN & ROBINSON, LLP

19 By: /s/ Patrick Moriarty  
20 PATRICK MORIARTY  
21 JOHN ROBINSON  
22 JOANNE TRAN  
23 Attorneys for Defendants  
24 CITY OF FAIRFIELD and ZACHARY  
25 SANDOVAL

26 Dated: January 11, 2023

27 BERTRAND FOX ELLIOT OSMAN & WENZEL

28 By: /s/ Richard Osman  
RICHARD W. OSMAN  
Attorneys for Defendants  
DUSTIN JOSEPH

///

///

CASTILLO, MORIARTY, TRAN & ROBINSON, LLP  
75 Southgate Avenue  
Daly City, California 94015

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

LAW OFFICE OF STANLEY GOFF

Dated: January 11, 2023

By:  /s/Stanley Goff  
STANLEY GOFF

Attorney for Plaintiffs  
CALVIN RUSH and JAYME RUSH

CASTILLO, MORIARTY, TRAN & ROBINSON, LLP  
75 Southgate Avenue  
Daly City, California 94015

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**ORDER**

IT IS SO ORDERED:

The dates are reset as follows:

Designation of Expert Witnesses due by 5/1/2023  
Discovery shall be completed by 6/5/2023  
Motions shall be filed by 6/20/2023  
Final Pretrial Conference set for 8/28/2023 at 1:30 PM (unchanged)  
Jury Trial set for 10/31/2023 at 9:00AM (unchanged)

Dated: January 13, 2023



WILLIAM B. SHUBB  
UNITED STATES DISTRICT JUDGE

CASTILLO, MORIARTY, TRAN & ROBINSON, LLP  
75 Southgate Avenue  
Daly City, California 94015