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6 Attorney for Defendant  
CITY OF REDDING, GARRETT MAXWELL, AND  
MATTHEW BRUCE  
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8 UNITED STATES DISTRICT COURT  
9 EASTERN DISTRICT OF CALIFORNIA

11 VERONICA MCLEOD, individually and  
as successor in interest to decedent,  
12 DOLORES HERNANDEZ; AMADO  
HERNANDEZ; individually and as  
13 successor in interest to decedent,  
DOLORES HERNANDEZ; and YSIDRA  
14 REGALDO, individually,

15 Plaintiff,

16 v.

17 CITY OF REDDING; GARRETT  
MAXWELL, an individual; MATTHEW  
18 BRUCE, an individual; and DOES 2-10,  
inclusive,  
19

20 Defendants.

Case No. 2:22-cv-00585-WBS-JDP

**JOINT STIPULATION AND REQUEST FOR  
ORDER TO MODIFY THE BRIEFING  
SCHEDULE FOR DEFENDANTS' FILED  
MOTION FOR SUMMARY JUDGMENT, OR  
IN THE ALTERNATIVE, SUMMARY  
ADJUDICATION AND ORDER**

Hon. WILLIAM B. SHUBB

Date: June 10, 2024

Time: 1:30 p.m.

Ctrm: 5

Trial: September 10, 2024

21 **TO THE HONORABLE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF**  
22 **RECORD:**

23 Plaintiffs VERONICA MCLEOD, individually and as successor in interest to decedent,  
24 DOLORES HERNANDEZ; AMADO HERNANDEZ, individually and as successor in interest to  
25 decedent, DOLORES HERNANDEZ; and YSIDRA REGALDO, individually (“Plaintiffs”), and  
26 Defendants CITY OF REDDING, GARRETT MAXWELL, and MATTHEW BRUCE  
27 (“Defendants”) (collectively “the Parties”), hereby submit this Stipulation and Request for Order  
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1 to Modify the Briefing Schedule for Defendants’ Filed Motion for Summary Judgment, or in the  
2 Alternative Summary Adjudication.

3 **STATEMENT OF GOOD CAUSE**

4 1. Defendants timely filed their Motion for Summary Judgment (or in the alternative,  
5 summary adjudication) pursuant to Rule 56 on April 24, 2024 (Dkt. No. 27 – “Motion for  
6 Summary Judgment”).

7 2. Pursuant to Local Rule 230(c) and (d) (and Rule (a)(1)(C)), Plaintiffs’ Opposition  
8 to Defendants’ Motion for Summary Judgment (Plaintiffs’ Opposition) is currently due on May 8,  
9 2024, and Defendants’ Reply to Plaintiffs’ Opposition (“Defendants’ Reply”) is due on May 20,  
10 2023.

11 3. Defense counsel (undersigned) has a pre-planned vacation from May 7, 2024, to  
12 May 14, 2024 and other non-case related pending motions, depositions, and hearings over the  
13 next two to three weeks. Accordingly, Defendants require additional time to prepare and file their  
14 Reply and are requesting an extension of the current filing deadline of May 20, 2023, for  
15 Defendants’ Reply.

16 4. The Parties have met and conferred and have come to an agreement to extend the  
17 current filing deadline of May 20, 2023, for Defendants’ Reply, to allow additional time to file  
18 Defendants’ Reply. In exchange, Defendants agree to also allow Plaintiffs additional time to file  
19 Plaintiffs’ Opposition and to extend the current filing deadline of May 8, 2023, for Plaintiffs’  
20 Opposition.

21 5. Defense counsel has provided a sworn declaration attesting to these  
22 aforementioned facts and provided additional information in support of this Stipulation.

23 6. Accordingly, the Parties hereby stipulate that there is good cause and jointly  
24 request that the Court enter an order modifying the briefing schedule for Defendants’ Motion for  
25 Summary Judgment as follows:

26 Deadline to file Plaintiffs’ Opposition from **May 8, 2024**, to **May 13, 2024**

27 Deadline to file Defendants’ Reply from **May 20, 2024**, to **May 28, 2024**.

28 IT IS SO STIPULATED

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Dated: May 6, 2024

Respectfully submitted,

ALLEN, GLAESSNER,  
HAZELWOOD & WERTH, LLP

By: /s/Ameet D. Patel  
DALE L. ALLEN, JR.  
AMEET D. PATEL  
Attorneys for Defendants  
CITY OF REDDING, GARRETT  
MAXWELL, and MATTHEW BRUCE

Dated: May 3, 2024

Respectfully submitted,

LAW OFFICES OF DALE K. GALIPO

By: /s/Hang D. Le  
DALE K. GALIPO  
HANG D. LE  
Attorneys for Plaintiffs


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**ORDER**

Good cause appearing, the parties' Stipulation to Modify the Briefing Schedule for Defendants' Motion for Summary Judgment (Dkt. No. 27) is GRANTED, and the scheduling order is hereby modified as set forth in the stipulation.

**IT IS SO ORDERED.**

Dated: May 7, 2024

  
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WILLIAM B. SHUBB  
UNITED STATES DISTRICT JUDGE