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15 Attorneys for Plaintiff G.I.S.E.

16 UNITED STATES DISTRICT COURT
17 EASTERN DISTRICT OF CALIFORNIA

18 G. I. S. E. by and through his guardian ad
19 litem, EDDIE SANCHEZ,

20 Plaintiff,

20 vs.

21 CITY OF CHICO, CHICO POLICE
22 DEPARTMENT, MARK BASS, DAVID
23 BAILEY, and DOES 1-50,

23 Defendants.

Case No.: 2:22-cv-01654-JDP

**STIPULATION TO CONTINUE SCHEDULING
DEADLINES AND ORDER**

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1 **STIPULATION**

2 Plaintiff G.I.S.E., by and through his guardian ad litem, EDDIE SANCHEZ, and Defendants
3 CITY OF CHICO, CHICO POLICE DEPARTMENT, MARK BASS, and DAVID BAILEY (the
4 “Chico Defendants”), by and through their respective counsel of record in the above-captioned
5 litigation, hereby stipulate and request that the Court enter an order to continue certain case
6 management deadlines.

7 WHEREAS, the parties were expecting to complete discovery in October 2024 by, among
8 other things, completing the depositions of certain percipient witnesses in Chico, California;

9 WHEREAS, counsel for the Chico Defendants is scheduled to commence trial in the United
10 States District Court for the Eastern District of California on October 7, 2024, in the case of the
11 *Estate of Tyler S. Rushing, et al. v. AG Private Protection, Inc., et al.* (U.S.D.C. Case No. 2:18-cv-
12 01692-DAD-AC);

13 WHEREAS, counsel for the Chico Defendants does not have sufficient time to complete
14 discovery in this matter by the current deadline of October 11, 2024, due to that federal trial; and

15 WHEREAS, counsel for both sides believe it makes sense to postpone discovery cutoff and
16 related pre-trial dates in this matter due to defense counsel’s trial schedule.

17 NOW, THEREFORE, the parties respectfully request this Court extend the deadlines in this
18 matter as follows:

Event	Current Deadline	Proposed Deadline
Discovery Cutoff	October 11, 2024	December 20, 2024
Motion to Compel Discovery Deadline	November 15, 2024	January 24, 2025
Last day to hear dispositive motion	December 18, 2024	February 28, 2025

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25 Good cause exists for continuance of deadlines reflected above as required pursuant to
26 Federal Rule of Civil Procedure Rule 16(b)(4) due to defense counsel’s trial schedule, which has
27 significantly impacted the parties’ ability to complete discovery.
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This is the parties' fourth request for continuance of case management deadlines. The parties do not currently foresee the need for a further continuance in the future.

IT IS SO STIPULATED.

Dated: September 20, 2024

LAW OFFICE OF FULVIO F. CAJINA

By: /s/ Fulvio Cajina
FULVIO F. CAJINA
Attorneys for Plaintiff
G.I.S.E.

Dated: September 20, 2024

ALVAREZ-GLASMAN & COLVIN

By: Sharon Medellín
Sharon Medellín
Attorneys for Defendants
CITY OF CHICO, et al.

1 **PROPOSED ORDER**

2 GOOD CAUSE APPEARING, the parties' stipulation is GRANTED, as modified below.

3 The following deadlines are CONTINUED and RESET as follows:

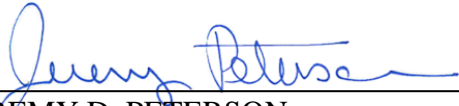
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Event	Current Deadline	Proposed Deadline
Discovery Cutoff	October 11, 2024	December 20, 2024
Motion to Compel Discovery Deadline	November 15, 2024	January 23, 2025
Last day to hear dispositive motion	December 18, 2024	February 27, 2025

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10 IT IS SO ORDERED.

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12 Dated: September 24, 2024

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14 _____
15 JEREMY D. PETERSON
16 UNITED STATES MAGISTRATE JUDGE
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