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5 Attorneys for plaintiffs  
6 **DANILO MARTIN MOLIERI and**  
**DANIEL STEVEN MOLIERI**

7  
8 **UNITED STATES DISTRICT COURT**  
9  
**FOR THE NORTHERN DISTRICT OF CALIFORNIA**

11	DANILO MARTIN MOLIERI and	)	Case No.: C10-05430 MMC
12	DANIEL STEVEN MOLIERI	)	
13		)	Complaint filed: 12/1/10
14	Plaintiff,	)	
15	vs.	)	STIPULATION AND REQUEST TO
16	COUNTY OF MARIN, et al.	)	EXTEND FACT DISCOVERY CUTOFF;
17	Defendants.	)	<del>(PROPOSED)</del> ORDER
18		)	
19		)	
20		)	

21 **STIPULATION**

22 Plaintiffs filed their complaint on December 1, 2010 and all parties were served and have  
23 answered. The court ordered fact discovery to be completed by December 2, 2011. Although  
24 the parties have been diligent and cooperative in conducting discovery, additional discovery is  
25 needed to prepare the case for resolution. The specific discovery items to be conducted are the  
26 depositions of San Francisco police officers Heppler and Zhang, two depositions of “persons

1 most knowledgeable, and the psychological examination of plaintiff Daniel Steven Molieri  
2 related to his damages claim (emotional distress). The proposed discovery extension through  
3 December 23, 2011 is not expected to affect or impose upon any other aspect of the court's  
4 scheduling order, including expert discovery deadlines.

5 WHEREFORE the parties, by and through their respective counsel stipulate, agree and  
6 request that, subject to approval and order of the court, the deadline for completing the above-  
7 referenced discovery will be extended to and including December 23, 2011.

8 LAW OFFICES OF JOHN L. BURRIS

9  
10 Dated: November 30, 2011

/S/JOHN L. BURRIS  
Attorneys for Plaintiffs  
DANILO MARTIN MOLIERI and  
DANIEL STEVEN MOLIERI

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12  
13 PATRICK K. FAULKNER,  
14 COUNTY COUNSEL

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16 Dated: November 30, 2011

/S/RENEE GIACOMINI BREWER  
Attorneys for Defendant  
COUNTY OF MARIN

17  
18 DENNIS J. HERRERA,  
19 CITY ATTORNEY

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21 Dated: November 30, 2011

/S/MICHAEL GERCHOW  
Attorneys for Defendant  
CITY AND COUNTY OF SAN FRANCISCO

1 **ORDER**

2  
3 The court having considered the stipulation of the parties and good cause  
4 appearing,

5 IT IS ORDERED that the deadline for completing fact discovery is modified to permit  
6 the depositions and discovery specified in the parties stipulation to be completed no later than  
7 December 23, 2011. The court's scheduling order is not modified in any other particular.

8  
9 Dated: December 1, 2011

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UNITED STATES DISTRICT JUDGE