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7	And Daniel Steven Molieri, Plaintiffs	
8		
9	UNITED STATES DISTRICT COURT	
10	NORTHERN I	DISTRICT OF CALIFORNIA
11	(SA	AN FRANCISCO)
12		
13	DANIEL MARTIN MOLIERI and, DANIEL STEVEN MOLIERI,	CASE NO. C-10-5430 MMC
14	Plaintiffs,	Complaint Filed: 12/1/2010
15		STIPULATION TO CONTINUE CASE
16	VS	MANAGEMENT CONFERENCE AND (PROPOSED) ORDER
17 18	COUNTY OF MARIN; Marin	
10 19	County Sheriff's Sergeant J. SCARDINA; Sheriff's Deputy	
20	ERIC RICHARDSON; Sheriff's Deputy BONDANZA; CITY AND	
20	COUNTY OF SAN FRANCISCO;	
22	San Francisco Police Sergeant R. COX; San Francisco Police	
23	Sergeant J. O'MALLEY; and DOES 1 through 25, inclusive,	
24	Defendants.	
25		/
26	STIPULATION	
27	The parties in this, the above-entitled	matter, by and through their respective counsel of
28	record, stipulate and agree to the following in support of their request to the court to continu	
		*
	STIPULATION TO MODIFY PRE	ETRIAL SCHEDULING ORDER
		Dockets.Ju

the case management conference, currently scheduled for February 1, 2013 at 10:30 a.m., to
February 22, 2013 at 10:30 a.m.

3		
4	Whereas the discovery in this case is complete, and dispositive motions argued and ruled	
5	upon by the court without appeal, the parties filed their joint case management statement on	
6	January 25, 2013. Subsequently, plaintiffs' counsel became aware of a scheduling conflict that	
7	cannot be circumvented. In consultation with defendants' counsel, it was determined that given	
8	trial scheduling (noted in the joint case management statement) February 22, 2013 is the only	
9	commonly available date that comports with the Court's case management conference calendar.	
10	The parties request the Court continue the pending case management conference from	
11	February 1, 2013 to February 22, 2013. If that date is not available to the Court, it is requested	
12	that the case management conference be vacated and that counsel be permitted to submit dates	
13 14	that are suitable to the Court's calendar. Currently, no date for the pretrial conference or trial	
14	has been set.	
16		
17	Dated: January 28, 2013 LAW OFFICES OF JOHN L. BURRIS	
18		
19	By: /S/JOHN L. BURRIS	
20	John L. Burris, Esq.	
21	Attorneys for Plaintiffs Danilo Martin Molieri and	
22	Daniel Steven Molieri	
23	Dated: January 28, 2013 PATRICK K. FAULKNER	
24	County Counsel	
25		
26	By: <u>/S/RENEE GIACOMINI BREWER</u> Renee Giacomini Brewer.	
27	Deputy County Counsel Attorneys for County of Marin	
28		
	STIPULATION TO MODIFY PRETRIAL SCHEDULING ORDER 2	

1	Dated: January 28, 2013 DENNIS J. HERRERA	
2	City Attorney JOANNE HOEPER	
3	Chief Trial Deputy	
4	By: <u>/S/MICHAEL GERCHOW</u>	
5	Michael Gerchow	
6	Deputy City Attorney Attorneys for Defendant	
7	City and County of San Francisco	
8		
9	<u>ORDER</u>	
10	The court, having considered the parties' stipulation and good cause appearing,	
11	IT IS ORDERED that the case management conference scheduled for February 1,	
12	2013 is continued to February 22, 1013 at 10:30 a.m.	
13	No further Joint Case Management Statement need be filed, unless the circumstances	
14	set forth in the statement filed January 25, 2013 have changed.	
15	bated: January 29, 2013 Dated: January 29, 2013	
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	STIPULATION TO MODIFY PRETRIAL SCHEDULING ORDER 3	