

1 ANN M. ASIANO (SBN 094891)  
2 JORDAN M. GREEN (SBN 130353)  
3 BRADLEY, CURLEY, ASIANO,  
4 BARRABEE, ABEL & KOWALSKI, P.C.  
5 1100 Larkspur Landing Circle, Suite 200  
6 Larkspur, CA 94939  
7 Telephone: (415) 464-8888  
8 Facsimile: (415) 464-8887  
9 E-Mail: [aasiano@professionals-law.com](mailto:aasiano@professionals-law.com)

10 Attorneys for Defendant  
11 JON ALEXANDER

12 UNITED STATES DISTRICT COURT  
13  
14 NORTHERN DISTRICT OF CALIFORNIA

15 MICHAEL REISE, an individual,  
16 Plaintiff,  
17 v.  
18 COUNTY OF DEL NORTE; CRESCENT  
19 CITY; CRESCENT CITY POLICE  
20 DEPARTMENT; COUNTY OF DEL  
21 NORTE SHERIFF'S DEPARTMENT;  
22 JON ALEXANDER; BRIAN NEWMAN;  
23 RICHARD GRIFFIN; BOB BARBER;  
24 KEITH DOYLE; DOUG PLACK; DOES  
25 1-10 inclusive,  
26 Defendants.

Case Number CV-12-03723-WHO  
THE PARTIES' STIPULATION AND  
ORDER TO EXTEND DEADLINE  
FOR COMPLETION OF DISCOVERY

Complaint Filed: July 16, 2012  
Trial Date: July 14, 2014

27 Counsel for Defendants COUNTY OF DEL NORTE, RICHARD GIFFIN, CRECENT CITY;  
28 CRESCENT CITY POLICE DEPARTMENT, KEITH DOYLE, DOUG PLACK and JON  
ALEXANDER ("Defendants"), and Plaintiff MICHAEL RIESE ("Plaintiff") hereby stipulate to extend  
the deadline to complete discovery in this matter. The parties respectively request the Court to extend  
that deadline to June 10, 2014.

Good cause exists to grant this request for the reasons outlined in the parties previous  
Stipulation and request for the Court to continue the trial date and all related deadlines. Moreover,

1 although that request was not granted, the Court did indicate a willingness to extend the discovery  
2 deadline to June 10, 2014.

3 **PROCEDURAL HISTORY:** See prior Stipulation for continuance of trial and all related  
4 deadlines.

5 **ARGUMENT:** See prior Stipulation for continuance of trial and all related deadlines. Since  
6 that time and the parties have agreed to the following deposition schedule:

7 May 27 Deposition of Keith Doyle (Crescent City)

8 May 28 Deposition of Stephanie Riese (San Diego)

9 May 30 Deposition of Tess Abad (Crescent City)

10 June 3 Deposition of Don Micheletti, M.D. and tentative deposition of COUNTY IT  
11 person

12 June 4 Depositions of Lisa Specchio, Dawn Walker and Padilla (Crescent City)

13 June 5 & 6 Deposition of Jon Alexander (location to be determined).

14 June 10 Depositions of Katie Micks and Sheriff Wilson (Crescent City)

15 There may be additional depositions required by the parties, including CHP Officer Mola, whose  
16 location has yet to be determined, and Jennifer Brown.

17 **DISPOSITIVE MOTIONS**

18 The parties also request a continuance to hear dispositive motions. The parties will need the  
19 certified transcripts of the witnesses to use in their dispositive motions. The turn around time for  
20 deposition transcripts is approximately two-weeks. Thus, the parties will not have the transcripts of  
21 Katie Micks and Sheriff Wilson, two key witnesses, until approximately June 24, 2014. The parties are  
22 requesting one week to prepare their dispositive motions with cites to the transcripts. Thus, the parties  
23 are requesting to file their dispositive motions on or before July 1, 2014, to be heard on or before  
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1 Wednesday, August 6, 2014.

2 **CONCLUSION**

3 The parties hereby respectfully request an extension of the discovery cut-off deadline to June  
4 10, 2014 and for dispositive motions to be heard on or before August 6, 2014. Good cause exists to  
5 grant this extension because (a) the parties have shown their good faith thus far in communicating via  
6 telephone and e-mail on a daily basis and a conference call on May 12, 2014 to schedule witness and  
7 party depositions, but are unable to schedule them before the current discovery cut-off date and (b) due  
8 to the nature of Plaintiff's allegations, there is a history of contacts with law enforcement officers that  
9 took place over a seven-year stretch. Due to the complexity of issues, the number of contacts to cover,  
10 and the number of parties with various interests in the case, witness depositions are taking the full  
11 seven hours, so parties have been unable to depose more than one party on a single date, despite trying  
12 to do so. The parties are working together and have made a significant amount of progress, but they  
13 need more time to complete witness depositions.  
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16 **Dated: May 12, 2014**

**BRADLEY, CURLEY, ASIANO,  
BARRABEE, ABEL & KOWALSKI, P.C.**

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19 **By: /s/ Jordan M. Green**

**ANN M. ASIANO  
JORDAN M. GREEN  
Attorneys for Defendant  
JON ALEXANDER**

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22  
23 **Dated: May 12, 2014**

**PATTON, WOLAN, CARLISLE, LLP**

24  
25 **By: /s/ Clariza C. Garcia**

**STEVEN C. WOLAN  
CLARIZA C. GARCIA  
Attorneys for Defendants  
COUNTY OF DEL NORTE AND  
RICHARD GRIFFIN**

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**Dated: May 12, 2014**

**HUNT & JEPPSON, LLP**

**By: /s/ Spencer Christesen**  
**SPENCER CHRISTENSEN**  
**Attorneys for Defendants**  
**CRESCENT CITY, CRESCENT CITY POLICE**  
**DEPARTMENT, KEITH DOYLE & DOUG PLACK**

**Dated: May12, 2014**

**BERG & ASSOCIATES**

**By: /s/ Howard Churchill**  
**HOWARD CHURCHILL**  
**Attorneys for Plaintiff**  
**MICHAEL RIESE**

**ORDER**

1  
2 PURSUANT TO STIPULATION AND THE COURT FINDING GOOD CAUSE, IT IS  
3 HEREBY ORDERED that:

4 Non-Expert Discovery cutoff: June 10, 2014

5 Dispositive Motions heard by: August 6, 2014  
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8 DATED: May 16, 2014  
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10 HONORABLE WILLIAM H. ORRICK  
11 UNITED STATES DISTRICT COURT JUDGE  
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