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12 Attorneys for Plaintiff  
 NOELLE KUEBERTH

14 UNITED STATES DISTRICT COURT  
 15 NORTHERN DISTRICT

17 NOELLE KUEBERTH,  
 18 Plaintiff,  
 19 v.

20 CITY OF UKIAH, POLICE CHIEF CHRIS  
 DEWEY, OFFICER JULIAN COVELLA,  
 21 OFFICER KEVIN MURRAY, DOES 1 to 10,  
 inclusive,  
 22 Defendants.

CASE NO.: CV 12-4272 JST

**STIPULATED REQUEST FOR ORDER  
 EXTENSION OF TIME TO FILE  
 DISCOVERY MOTIONS [Civil L.R. 6-2(a)];  
~~Proposed~~ ORDER THEREON**

*Unlimited Civil*

24  
 25 TO THIS HONORABLE COURT:

26 The parties hereby request, by way of stipulation, an order extending the deadline to file  
 27 motions to compel fact discovery from May 21, 2014 to June 4, 2014. In so doing, the parties, by  
 28 and through their counsel of record, agree and stipulate as follows:

LAW OFFICES OF  
 GEARY,  
 SHEA,  
 O'DONNELL,  
 GRATTAN &  
 MITCHELL  
 P.C.

1           1.       The last day to file a motion to compel, per local rule, is May 21, 2014. The fact  
2 discovery cut-off date per this Court’s Scheduling Order is May 14, 2014, and Civil Local Rule 37-  
3 3 sets the last day for discovery motions one week later.

4           2.       The parties wish to ensure sufficient time to meaningfully meet and confer should  
5 any dispute regarding written discovery arise, and therefore stipulate that good cause exists to  
6 change time. The parties thus request a two-week extension of time to file a motion to compel.

7           3.       The parties have not previously stipulated or agreed to any prior time modification,  
8 although the Court did order a new trial schedule upon appointment of counsel for plaintiff.

9           4.       The instant extension of time would not otherwise significantly affect the schedule  
10 of this case.

11           IT IS SO STIPULATED.

12  
13 DATED: May 13, 2014

GEARY, SHEA, O'DONNELL, GRATTAN &  
MITCHELL, P.C.

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16 By: /s/ Robert W. Henkels  
17 ROBERT W. HENKELS  
18 Attorneys for Defendants  
CITY OF UKIAH, POLICE CHIEF CHRIS  
DEWEY, OFFICER JULIAN COVELLA and  
OFFICER KEVIN MURRAY

19 DATED: May 13, 2014

MORRISON & FOERSTER LLP

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21 By: /s/ Kay Fitz-Patrick  
22 KAY FITZ-PATRICK  
23 Attorneys for Plaintiff  
NOELLE KUEBERTH

24           **ORDER**

25           After review of the parties’ Stipulation and Request, and good cause appearing, the Court  
26 hereby GRANTS the parties’ request to change time and EXTENDS the last day for the parties to  
27 file motions to compel fact discovery to currently outstanding discovery from May 21, 2014 to June  
28 4, 2014.

LAW OFFICES OF  
GEARY,  
SHEA,  
O'DONNELL,  
GRATTAN &  
MITCHELL  
P.C.

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**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Dated: May 21, 2014



LAW OFFICES OF  
GEARY,  
SHEA,  
O'DONNELL,  
GRATTAN &  
MITCHELL  
P.C.

E-FILING ATTESTATION

I, Robert Henkels, am the ECF User whose ID and password are being used to file the foregoing document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that Kay Fitzpatrick has concurred in this filing.

By /s/  
ROBERT W. HENKELS

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SHEA,  
O'DONNELL,  
GRATTAN &  
MITCHELL  
P.C.