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19 Attorneys for Defendants

20 UNITED STATES DISTRICT COURT
 21 NORTHERN DISTRICT OF CALIFORNIA

22 JOE PERVOE, individually and as successor in
 23 interest to John Wayne McGee, and CAROLYN
 24 COPELAND, individually,

25 Plaintiff,

26 v.

27 RYAN SWETAVAGE, an individual; MIGUEL
 28 IBARRA, an individual; LONALA
 KAHO'ALI'I, an individual; ANDREA
 NEDEROSTEK, an individual; TRAVIS
 HIGGINS, an individual; DEREK MEZA, an
 individual; CHRISTOPHER HAENDEL, an
 individual; ALBERTO-ANDRES HOLMES, an
 individual; JOHN TOWNSLEY, an individual;
 THOMAS NELSON, an individual; and DOES
 1-50, inclusive, in their capacities as Sheriff's
 Deputies for the COUNTY OF ALAMEDA,

Defendants.

CASE NO.: 4:12-cv-04286 JST

**STIPULATION REGARDING MOTION TO
 COMPEL DEADLINE; ~~PROPOSED~~
 ORDER**

1 **STIPULATION**

2 WHEREAS, the parties have proceeded with conducting discovery in the instant action;

3 WHEREAS, the parties previously submitted to the Court a Stipulation Regarding ADR,
4 Expert Witness Designations, and Fact Discovery on February 2, 2015, to extend the completion of
5 fact discovery;

6 WHEREAS, the Court ordered the close of fact discovery extended to March 5, 2015, such
7 that Plaintiffs' should respond to Defendants' contention interrogatories by the close of fact
8 discovery;

9 WHEREAS, the parties have met and conferred regarding Plaintiffs' discovery responses
10 and Plaintiffs' agreed to supplement their responses, including contention interrogatories
11 responses;

12 WHEREAS, Plaintiffs' failed to provide supplemental responses to Defendants' contention
13 interrogatories and other fact discovery by March 5, 2015;

14 WHEREAS, pursuant to Civil L.R. 37-3 Defendants' deadline to file a motion to compel
15 further responses to their discovery requests is March 12, 2015;

16 WHEREAS, Plaintiffs' counsel has assured Defendants' counsel that Plaintiffs'
17 supplemental discovery responses will be served on March 11, 2015;

18 WHEREFORE, the parties respectfully request that the Court's scheduling order in this
19 action be modified to allow the Plaintiffs' time to serve supplemental discovery responses and so
20 that Defendants may have sufficient time to review the responses prior to expiration of the motion
21 to compel deadline, by:

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