

1 Russell A. Robinson, SBN 163937
 2 Law Office of Russell A. Robinson
 3 345 Grove Street, 1st Floor
 4 San Francisco, CA 94102
 Phone: 415.861.4416
 Fax: 415.431.4526
 rlaw345@gmail.com

5 Counsel for Plaintiff
PATRICK J. TOBIN

8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA

10 PATRICK J. TOBIN,) No. C-13-1504-MEJ
11)
12 Plaintiff,) STIPULATION TO EXTEND TIME WITHIN
13 v.) WHICH TO COMPLETE DEPOSITION OF
14 CITY & COUNTY OF SAN FRANCISCO, et al.,) NON-PARTY WITNESS NICOLE GREELY
15 Defendants.) [Proposed] ORDER
_____) [Jury Trial Demanded]
)
)

17 The parties hereto, through counsel of record, hereby stipulate as follows:

18 The Court previously extended several times, upon stipulation, discovery deadlines. The
 19 parties completed all discovery anticipated at the time of the previous request except for the
 20 deposition of non-party Nicole Greely. Nicole Greely is a retired lieutenant with the San
 21 Francisco Police Department who, among other things was involved with the SPOT program.
 22 Ms. Greely was to be deposed on Thursday, January 21, 2016.

23 The City Attorney's Office, despite good faith efforts, cannot secure Ms. Greely for
 24 deposition, and she has informed Defendant's counsel that she must be served personally with
 25 a subpoena before being deposed..

27 ///

1 Thus, the parties through counsel request that Plaintiff be permitted to depose Ms.
2 Greely on or before March 4, 2016. No other dates need be changed at this time.

3
4 Date: January 21, 2016

Russell A. Robinson /s/
Russell A. Robinson
Law Office of Russell A. Robinson
Counsel for Plaintiff
PATRICK J. TOBIN

5
6
7
8
9
10 Date: January 21, 2016

/s/
Andrew M. Gschwind
Office of the City Attorney
City & County of San Francisco
Counsel for Defendant
CITY & COUNTY OF SAN FRANCISCO


11
12
13
14
15
16 **ORDER**

17 Good cause appearing, it is hereby ordered as follows:

18 Plaintiff shall be permitted to depose Ms. Greely on or before March 4, 2016. No other
19 case management dates are to be changed at this time.

20 **IT IS SO ORDERED.**

21
22 Date: January 26, 2016



Hon. Maria-Elena James
USDC, Northern Dist. Of California