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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

SAHLEEM TINDLE, et al.,

Plaintiffs,

v.

CITY OF DALY CITY, et al.,

Defendants.

Case No. 13-cv-02449-HSG (DMR)

STIPULATION AND ORDER TO EXTEND FACT DISCOVERY

The parties believe it would be beneficial to extend fact discovery so that the parties can schedule the remaining depositions. The parties believe the following facts establish good cause for the length of the proposed extensions.

1. The parties filed a Joint Discovery Letter Brief (D.I. 98) with the Court on August 13, 2015 requesting adjudication of a discovery dispute concerning production of sensitive documents within the possession, custody, and control of the Defendants.

2. The discovery dispute was referred to Magistrate Judge Donna M. Ryu, who scheduled a Motion Hearing on August 27, 2015 (D.I. 100).

3. Judge Ryu issued an order granting Plaintiffs' Motion to Compel subject to the entry of a stipulated protective order (D.I. 104) on September 15, 2015.

4. The parties worked diligently on a protective order, which was filed with the Court

on October 1, 2015.

5. Defendants have not yet produced the materials ordered by Judge Ryu on September 15 because the order conditioned production on entry of the protective order. Plaintiffs have therefore had no opportunity to review those documents, and desire the opportunity to review those documents in advance of the depositions of Defendants Hart and Busalacchi. The parties believe the two month extension would give adequate time for Defendants to produce the ordered materials, for Plaintiffs to review them, and for the parties to schedule and execute the subsequent depositions.

6. In addition, Defendants have been seeking the deposition of all Plaintiffs in this action since June of 2015. Despite the parties' best efforts, scheduling conflicts have kept Defendants from securing deposition dates. Currently, the first available dates for deposition of Plaintiffs are October 19, 2015, which is beyond the present discovery cut-off.

The parties hereby agree, subject to the Court's approval, that the Order Setting Case Schedule entered on March 18, 2015 (D.I. 86) and the Scheduling Order entered on August 6, 2015 (D.I. 97) is further amended as follows:

1. The deadline for all fact discovery is extended until or before December 9, 2015.

2. The deadline for the last day to add new parties to the complaint is extended until or before December 23, 2015.

3. The deadline for expert designations in this case is extended until or before January 6, 2016.

4. The deadline for the close of expert discovery in this case is extended until or before March 8, 2016.

5. The deadline for the last day to file dispositive motions in this case is extended until or before April 5, 2016.

6. The deadline for the pretrial conference in this case is extended until or before June 27, 2016.

7. The deadline for trial in this case is extended until or before July 11, 2016.

8. For convenience, the following table sets forth the case deadlines set in the Order Setting Case Schedule (D.I. 86), the Scheduling Order (D.I. 97), and the deadlines as modified by this Order:

Event	Prior Deadline	Current Deadline	New Deadline
Close of Fact Discovery	Sept. 11, 2015	Oct. 9, 2015	Dec. 9, 2015
Last Day to Add New Parties to Complaint	Sept. 25, 2015	Oct. 23, 2015	Dec. 23, 2015
Expert Designations	Oct. 23, 2015	Nov. 6, 2015	Jan. 6, 2016
Close of Expert Discovery	Dec. 18, 2015	Jan. 8, 2016	Mar. 8, 2016
Last Day to File Dispositive Motions	Feb. 5, 2016	Feb. 5, 2016	Apr. 5, 2016
Pretrial Conference	Apr. 26, 2016	Apr. 26, 2016	Jun. 27, 2016
Trial	May 9, 2016	May 9, 2016	July 11, 2016

Dated: October 15, 2015

By: */s/ Jeffrey T. Fisher*
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FILER'S ATTESTATION

I attest that concurrence in the electronic filing of this document has been obtained from Defendants' counsel.

Dated: October 15, 2015

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PURSUANT TO STIPULATION on this 15th day of October, 2015, **IT IS SO ORDERED except that the pretrial conference will be held on June 28, 2016, at 3:00 p.m. and jury trial will begin on July 25, 2016, at 8:30 a.m.**

HAYWOOD S. GILLIAM JR.
United States District Judge