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5 Attorneys for Defendants
 CITY OF SANTA CLARA, MIKE HORN,
 6 NATHAN CRESCINI, JOSH HIGGINS,
 FRANK HAGG, and TROY CARDIN
 7

8 UNITED STATES DISTRICT COURT

9 NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO

10 A. C., a minor, by and through his Guardian)
 Ad Litem, MARK CALHOUN,)

11 Plaintiff,)

12 vs.)

13 CITY OF SANTA CLARA, a municipal)
 14 corporation; MIKE HORN, individually and in)
 his official capacities as a police officer for the)
 15 CITY OF SANTA CLARA Police Department;)
 NATHAN CRESCINI, individually and in his)
 16 official capacities as a police officer for the)
 CITY OF SANTA CLARA Police Department;)
 17 JOSH HIGGINS, individually and in his official)
 capacities as a police officer for the CITY OF)
 18 SANTA CLARA Police Department; FRANK)
 HAGG, individually and in his official capacities)
 19 as a police officer for the CITY OF SANTA)
 CLARA Police Department; TROY CARDIN;)
 20 individually and in his official capacities as a)
 police officer for the CITY OF SANTA CLARA)
 21 Police Department; and DOES 1-50, inclusive,,)

22 Defendant.)
 23

Case No.: C13-3276 HSG (NC)

**STIPULATION AND ~~PROPOSED~~
 ORDER EXTENDING DEADLINES FOR
 FACT DISCOVERY, EXPERT
 DISCLOSURE/DISCOVERY AND
 DISPOSITIVE MOTIONS**

24 The parties hereto, by and through their respective counsel, hereby stipulate and request
 25 that the current deadlines for fact discovery, expert disclosure and discovery, and dispositive
 26 motions be extended by approximately 30 days, as set forth below. The current trial date would
 27 not be affected by the requested extension.

28 The reason for the requested extension is that the parties require additional time to

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1 conduct discovery. In particular, one of the defendant police officers is unable to sit for
2 deposition due to a serious injury he sustained in a car accident. It is anticipated that the officer
3 will be able to sit for deposition by mid-March. In addition, the parties require additional time
4 to complete other necessary party and witness depositions. The parties expect to have these
5 depositions completed by the end of March or early April. The undersigned attorneys are
6 working diligently to get these depositions scheduled in a coordinated and timely manner.

7 This is the first extension of the case schedule requested by the parties in this case. The
8 parties have agreed upon, and request the Court to adopt, the following new case schedule:

9 TRIAL DATE: 9/8/2015, at 8:30 a.m. (same as orig. date)
10 FINAL PRETRIAL CONFERENCE: 8/11/2015, at 3:00 p.m.
11 DISPOSITIVE MOTIONS: Last day to be heard 7/2/2015, at 2:00 p.m.
12 See Civil Local Rules for notice and filing requirements.
13 NON-EXPERT DISCOVERY CUT-OFF: 4/7/2015
14 EXPERT REPORTS: Opening reports by 4/14/2015
15 Rebuttal reports by 5/5/2015
16 EXPERT DISCOVERY CUT-OFF: 5/22/2015

17
18 IT IS SO STIPULATED.

19
20 Dated: February 19, 2015

LAW OFFICES OF JOHN L. BURRIS

21
22 By: */s/ DeWitt M. Lacy
DeWitt M. Lacy
Attorneys for Plaintiffs
23 *Mr. Lacy provided his consent that this
24 document be electronically filed

25 Dated: February 19, 2015

HAAPALA, THOMPSON & ABERN, LLP

26
27 By: /s/ Rebecca S. Widen
Rebecca S. Widen
28 Attorneys for Defendants

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ORDER

The Court having considered the parties' stipulation, and good cause appearing, IT IS
HEREBY ORDERED that the current case schedule be extended as requested. The new case
schedule shall be as follows:

- TRIAL DATE: 9/8/2015, at 8:30 a.m. (same as orig. date)
- FINAL PRETRIAL CONFERENCE: 8/11/2015, at 3:00 p.m.
- DISPOSITIVE MOTIONS: Last day to be heard 7/2/2015 at 2:00 p.m.
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- NON-EXPERT DISCOVERY CUT-OFF: 4/7/2015
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Rebuttal reports by 5/5/2015
- EXPERT DISCOVERY CUT-OFF: 5/22/2015

Dated: 2/23/2015



Hon. Haywood S. Gilliam, Jr.
United States District Judge