

1 Rebecca S. Widen, SBN 219207  
 HAAPALA, THOMPSON & ABERN, LLP  
 2 1939 Harrison Street, Suite 800  
 Oakland, California 94612  
 3 Tel: 510-763-2324  
 Fax: 510-273-8534  
 4 E-mail: rwidon@htalaw.com

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, )

Case No.: C13-3276 HSG (NC)

**STIPULATION AND ORDER  
 EXTENDING EXPERT DISCLOSURE  
 AND DISCOVERY DEADLINES**

12 vs. )  
 13 )

14 CITY OF SANTA CLARA, a municipal )  
 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 )

24 The parties hereto, by and through their respective counsel, hereby stipulate and request  
 25 that the expert disclosure and discovery deadlines be extended by approximately 35 days, as set  
 26 forth below. The remainder of the case schedule, including the trial date, is not affected by the  
 27 requested extension.

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

Haapala, Thompson & Abern LLP  
 Attorneys At Law  
 Park Plaza Building  
 1939 Harrison St., Suite 800  
 Oakland, California 94612  
 Telephone: 510-763-2324  
 Facsimile: 510-273-8534

Haapala, Thompson & Abery LLP  
Attorneys At Law  
Park Plaza Building  
1939 Harrison St., Suite 800  
Oakland, California 94612  
Telephone: 510-763-2924  
Facsimile: 510-273-8534

1 receive recently discovered medical and mental health records of plaintiff which are relevant to  
2 defense expert review and opinion. The undersigned counsel are working cooperatively to  
3 obtain the required authorizations from plaintiff, and anticipate that these records will be  
4 available within the next 30 days.

5 This is the second extension requested by the parties in this case.

6 The parties have agreed upon, and hereby request the Court to adopt, the following new  
7 case schedule:

8 TRIAL DATE: 9/8/2015, at 8:30 a.m.

9 FINAL PRETRIAL CONFERENCE: 8/11/2015, at 3:00 p.m.

10 DISPOSITIVE MOTIONS: Last day to be heard 7/2/2015, at 2:00 p.m.  
11 See Civil Local Rules for notice and filing requirements.

12 NON-EXPERT DISCOVERY CUT-OFF: 4/7/2015

13 EXPERT REPORTS: Opening reports by 5/19/2015  
14 Rebuttal reports by 6/2/2015

15 EXPERT DISCOVERY CUT-OFF: 6/19/2015

16  
17 IT IS SO STIPULATED.

18  
19 Dated: March 31, 2015

LAW OFFICES OF JOHN L. BURRIS

20  
21 By: \*/s/ DeWitt M. Lacy  
DeWitt M. Lacy  
Attorneys for Plaintiffs  
22 \*Mr. Lacy provided his consent that this  
23 document be electronically filed

24 Dated: March 31, 2015

HAAPALA, THOMPSON & ABERN, LLP

25  
26 By: /s/ Rebecca S. Widen  
Rebecca S. Widen  
Attorneys for Defendants  
27  
28

Haapala, Thompson & Abern LLP  
Attorneys At Law  
Park Plaza Building  
1939 Harrison St., Suite 800  
Oakland, California 94612  
Telephone: 510-763-2924  
Facsimile: 510-273-8534


1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**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.
- 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.  
See Civil Local Rules for notice and filing requirements.
- NON-EXPERT DISCOVERY CUT-OFF: 4/7/2015
- EXPERT REPORTS: Opening reports by 5/19/2015  
Rebuttal reports by 6/2/2015
- EXPERT DISCOVERY CUT-OFF: 6/19/2015

Dated: April 1, 2015

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