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8 Attorneys for Defendants
9 CITY OF SANTA CLARA, MIKE HORN,
10 NATHAN CRESCINI, JOSH HIGGINS,
11 FRANK HAGG and TROY CARDIN
12

13 UNITED STATES DISTRICT COURT

14 NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO

15 A. C., a minor, by and through his Guardian) Case No.: C13-3276 HSG (NC)
16 Ad Litem, MARK CALHOUN,)
17) **STIPULATION AND ORDER FURTHER**
18) **EXTENDING EXPERT DISCLOSURE**
19) **AND DISCOVERY DEADLINES**
20)
21) **Plaintiff,**
22)
23) **vs.**
24)
25) CITY OF SANTA CLARA, a municipal)
26) corporation; MIKE HORN, individually and in)
27) his official capacities as a police officer for the)
28) CITY OF SANTA CLARA Police Department;)
NATHAN CRESCINI, individually and in his)
official capacities as a police officer for the)
CITY OF SANTA CLARA Police Department;)
JOSH HIGGINS, individually and in his official)
capacities as a police officer for the CITY OF)
SANTA CLARA Police Department; FRANK)
HAGG, individually and in his official capacities)
as a police officer for the CITY OF SANTA)
CLARA Police Department; TROY CARDIN;)
individually and in his official capacities as a)
police officer for the CITY OF SANTA CLARA)
Police Department; and DOES 1-50, inclusive,,)
Defendant.)

29 The parties hereto, by and through their respective counsel, hereby stipulate and request
30 that the expert disclosure and expert discovery deadlines be extended by approximately two
31 weeks, as set forth below. The remainder of the case schedule, including the trial date, is not
32 affected by the requested extension.

33 The reason for the requested extension is that Plaintiff Austin Calhoun advised today

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1 that he has had a conflict arise which prevents him from attending his currently scheduled
2 Rule 35 examination on April 28, 2015 with neuropsychologist Ronald Ruff, PhD. Today is the
3 last day to cancel the examination without incurring a cancellation fee from Dr. Ruff.

4 Dr. Ruff's next available appointment is May 14, 2015, which is only two business days
5 before the current deadline for disclosure of expert reports. As Dr. Ruff requires more than two
6 business days to prepare his report, the parties have agreed to extend the current deadlines for
7 expert report disclosure, rebuttal report disclosure and expert discovery by two weeks, so that
8 the examination may proceed on May 14, 2015.

9 This is the third extension of the case schedule requested by the parties in this case.

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

12	TRIAL DATE:	9/8/2015, at 8:30 a.m. (same)
13	FINAL PRETRIAL CONFERENCE:	8/11/2015, at 3:00 p.m. (same)
14	DISPOSITIVE MOTIONS:	Last day to be heard 7/2/2015, at 2:00 p.m. See Civil Local Rules for notice and filing requirements (same)
15		
16	NON-EXPERT DISCOVERY CUT-OFF:	4/7/2015 (same)
17	EXPERT REPORTS:	Opening reports by 6/5/15 Rebuttal reports by 6/19/15
18		
19	EXPERT DISCOVERY CUT-OFF:	7/8/2015

20 IT IS SO STIPULATED.

21 Dated: April 23, 2015

LAW OFFICES OF JOHN L. BURRIS

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

25 Dated: April 23, 2015

HAAPALA, THOMPSON & ABERN, LLP

27 By: /s/ Rebecca S. Widen
Rebecca S. Widen
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.
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 6/5/15
Rebuttal reports by 6/19/15
EXPERT DISCOVERY CUT-OFF: 7/8/2015

Dated: April 24, 2015



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