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11 Attorneys for Plaintiffs
 12 ANNE REBUCAS, et al

13 UNITED STATES DISTRICT COURT
 14 FOR THE NORTHERN DISTRICT OF CALIFORNIA

15 ANNE REBUCAS, et al,

Case No.: 3:14-cv-03313-EMC

16 Plaintiff,

**STIPULATION AND [PROPOSED] ORDER
 CONTINUING EXPERT DISCOVERY
 DEADLINES**

17 vs.

18 CITY OF SAN BRUNO, et al,

19 Defendants.

20 **TO THE COURT AND TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

21 WHEREAS, the parties are currently not in possession of the Total Station Laser Scan
 22 performed by and during the San Mateo County District Attorney’s investigation of the subject
 23 incident;

24 WHEREAS, counsel for Defendants are attempting to secure said Total Station Laser Scan
 25 data from the San Mateo County District Attorney’s Office and have agreed to produce same to
 26 counsel for Plaintiffs if and when received;

1 WHEREAS, in response to Plaintiffs' request, Defendants have agreed to produce the
2 underlying data obtained from laser scans performed by their designated experts, Ted Kobayashi and
3 Craig Fries;

4 WHEREAS, Plaintiffs contend that the disclosure of this underlying data is necessary for
5 Plaintiffs' experts to accurately examine the evidence for the purpose of reconstruction and rebuttal,
6 if necessary;

7 IT IS HEREBY STIPULATED by and between plaintiffs ANNE REBUCAS, et al, and
8 Defendants CITY OF SAN BRUNO, et al, through their counsel of record, in the interests of judicial
9 economy and justice, all would benefit from a continuance of the initial and rebuttal expert report
10 deadlines, which are presently set for January 12, 2017 and February 2, 2017, respectively, (see
11 Document No. 53 at 1:27-8) to March 1, 2017. The parties further agree that the expert discovery
12 cut-off should and will be extended from February 23, 2017 (see Document 53 at 2:1) to March 31,
13 2017.

14
15 IT IS SO STIPULATED.

16
17 Dated: February 2, 2017

THE LAW OFFICES OF JOHN L. BURRIS

18
19 By /s/ DeWitt Lacy
20 DeWITT M. LACY, Esq.
21 Attorney for Plaintiff

22
23 Dated: February 2, 2017

HOWARD ROME MARTIN & RIDLEY LLP

24
25 By */s/
26 Todd Holton Master
27 Shawn Michael Ridley
28 Attorneys for Defendants
CITY OF SAN BRUNO, ET AL
*Mr.Master has given his consent to file this
document electronically.

1 **~~PROPOSED~~ ORDER**

2
3 PURSUANT TO STIPULATION, the Court hereby modifies its Case Management and
4 Pretrial Order for Jury Trial (Document No. 53) to extend the deadline for the production of initial
5 and rebuttal expert reports to March 1, 2017 and to extend the expert discovery cut-off to March 31,
6 2017. The March 9, 2017 motion hearing is vacated.

7
8 **SO ORDERED.**

9 Dated: February 3, 2017

