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5 Counsel for Plaintiff  
 6 **OSMAN YOUSIF**

7  
 8 UNITED STATES DISTRICT COURT  
 9 NORTHERN DISTRICT OF CALIFORNIA

11	OSMAN YOUSIF,	)	No. 15-CV-4887-WHA
		)	
12	Plaintiff,	)	<b>PLAINTIFF'S ADMINISTRATIVE MOTION</b>
		)	<b>FOR LEAVE TO FILE AMENDED</b>
13	v.	)	<b>COMPLAINT ON OR BEFORE FEBRUARY</b>
		)	<b>14, 2016; DECLARATION</b>
14	COUNTY OF SAN MATEO, SHERIFF	)	
	GREG MUNKS, et al.,	)	<b>[JURY TRIAL DEMANDED]</b>
15		)	
	Defendants.	)	
16		)	

17 **I. MOTION**

18 TO THE HONORABLE COURT HEREIN:

19 PLAINTIFF IN THIS CASE HEREBY moves and applies to the Court for leave to file his  
 20 amended complaint or before February 14, 2016. This request is based on the following:

21 On October 22 2015, Plaintiff caused this action to be filed *in proper*.

22 Three, separate motions to dismiss have been filed by different groups of defendants.

23 After being retained on February 2, 2016, counsel determined that an amended complaint was  
 24

1 needed rather than opposition to one or more motions. Counsel notified the Court and  
2 opposing counsel of this intent on February 2, 2016. [DN 26]

3 The continuing work and investigation, including the need to speak to a witness in the  
4 State of Kansas, has been impeded by the sudden death of an unrelated client in an Oakland  
5 Hills house fire the week of February 3, 2016, the need to assist several San Francisco Police  
6 officers with personnel issues, and the need to start picking a jury in a case now going out in  
7 San Joaquin County (*Helm v. Petz*).

8 Depending upon what information counsel is able to gather on the judicial holiday,  
9 February 12, 2016, Osman Yousif's claims may be greatly impacted.

10 The amended complaint (AC) is due February 10, 2016.

11 As of this filing, because of the press of business, counsel has been unable to meet and  
12 confer before this deadline.

13 Thus, in view of the facts that there may be evidence critical to this case which likely will  
14 be available as February 12-13, 2016, that there is no prejudice to Defendants should the four-  
15 day extension be granted, and other factors discussed above, Plaintiff through the undersigned  
16 counsel respectfully requests that he be granted an additional four days to file his AC.  
17

18  
19 Date: February 10, 2016

20 Russell A. Robinson /s/  
21 By: Russell A. Robinson  
22 Law Office of Russell A. Robinson  
23 Counsel for Plaintiff  
24 **OSMAN YOUSIF**

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1 **II. DECLARATION**

2 I, Russell A. Robinson, hereby declare as follows:

3 1. I am an attorney licensed to practice before all courts of this State and am  
4 admitted in the United States District Court for the Northern District of California. I am now  
5 Plaintiff's counsel of record herein. The below true and correct facts are of my own personal  
6 knowledge except facts stated as based on information and belief; as to facts so stated, I  
7 believe these to be true.

8 2. Plaintiff hereby moves, through me, and applies to the Court for leave to file his  
9 amended complaint on or before February 14, 2016.

10 3. On October 22 2015, Plaintiff caused this action to be filed *in proper*.

11 4. Three, separate motions to dismiss have been filed by different groups of  
12 defendants. After being retained on February 2, 2016, I determined that an amended complaint  
13 was needed rather than opposition to one or more motions. I notified the Court and opposing  
14 counsel of this intent on February 2, 2016. [DN 26]

15 5. The continuing work and investigation, including the need to speak to a witness  
16 in the State of Kansas, has been impeded by the sudden death of an unrelated client in an  
17 Oakland Hills house fire the week of February 3, 2016, the need to assist several San Francisco  
18 Police officers with personnel issues, and the need to start picking a jury in a case now going  
19 out in San Joaquin County (*Helm v. Petz*).

20 6. Depending upon what information I am able to gather on the judicial holiday,  
21 February 12, 2016, Osman Yousif's claims may be greatly impacted.

22 7. The amended complaint (AC) is due February 10, 2016.



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9 **OSMAN YOUSIF**

10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA


12 OSMAN YOUSIF, ) No. 15-CV-4887-WHA  
13 Plaintiff, )  
14 v. ) **[Proposed] ORDER GRANTING**  
15 ) **PLAINTIFF'S ADMINISTRATIVE MOTION**  
16 COUNTY OF SAN MATEO, SHERIFF )  
17 GREG MUNKS, et al., )  
18 Defendants. ) Trial: [Not yet set]  
19 ) **[Jury Trial Demanded]**

20 Good cause appearing, the application of Plaintiff in this case, before this Court is  
21 hereby granted.

22 Plaintiff in this case may file is amended complaint on or before February 14, 2016.

23 **IT IS SO ORDERED.**

24 Date: February 11, 2016

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26 \_\_\_\_\_  
27 Hon. WILLIAM H. ALSUP  
28 United States District Court, N. District of California