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12 Attorneys for Defendants, CITY OF SAN JOSE

13  
 14 UNITED STATES DISTRICT COURT  
 15 NORTHERN DISTRICT OF CALIFORNIA

16 MOHAMMAD BADAR NAVEED, an  
 17 individual; HUMZA AHMAD, an individual,  
 18 Plaintiffs,

19 v.

20 CITY OF SAN JOSE, a municipal  
 corporation; SAN JOSE POLICE  
 21 DEPARTMENT; Officer Jonathan Koenig  
 (4208), an individual; Officer Edgar Nava  
 22 (4204), an individual; Sgt. Doug Tran  
 (3269), an individual; Officer Elizabeth  
 23 Ornelas (4201), an individual; et al., and  
 DOES, inclusive,

24 Defendant(s).

Case Number: 15-cv-05298 EDL

**STIPULATION TO CONTINUE  
 DISCOVERY DEADLINES; ORDER  
 AS MODIFIED**

**STIPULATION**

The parties to this Stipulation agree and request as follows:

1 1. Due to medical issues on the part of Defendants' counsel, the parties have not  
2 completed discovery in this case, and agree that this matter may benefit from further  
3 settlement discussions before completing discovery. A mediator has been appointed but  
4 said medical conditions also prevented the mediation from taking place. Another attorney  
5 for Defendants has been assigned to work on completing these issues.

6 2. Currently, the fact discovery cutoff is set for February 14, 2017

7 3. Expert disclosures are due March 7, 2017, with rebuttal disclosures due March  
8 21, 2017. Expert discovery closes April 25, 2017.

9 4. July 11, 2017 is the date set for trial in this matter.

10 5. As stated, the parties believe that mediation may prove beneficial, especially  
11 if conducted prior to the expense of completing discovery. Therefore, the parties request  
12 an extension of the discovery deadline until March 31, 2017, in order to give the parties  
13 time to set up and complete a mediation in early February.

14 6. The parties request that the expert disclosure deadline be extended until April  
15 28, 2017 and that rebuttal disclosures occur on May 19, 2017.

16 7. This extension will not affect the Trial date or Pretrial Conference dates, already  
17 scheduled for July 11, 2017 and June 13, 2017, respectively.

18  
19 **IT IS SO STIPULATED.**

20 Dated: January 24, 2017

BUSTAMANTE & GAGLIASSO, P.C.

21  
22 /s/ Steven M. Berki, Esq.  
Steven M. Berki

23 Counsel for Plaintiffs

24  
25 Dated: January 25, 2017

RICHARD DOYLE, City Attorney

26  
27 By: /s/ Clifford S. Greenberg  
CLIFFORD S. GREENBERG  
Senior Deputy City Attorney

Attorneys for Defendants

**ORDER AS MODIFIED**

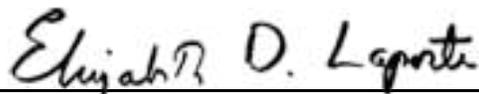
Pursuant to the foregoing stipulation of the Parties and good cause appearing therefore, the Court orders as follows:

<u>Event</u>	<u>Previous Date</u>	<u>New Date</u>
Non- Expert Discovery Cut-Off	February 14, 2017	<u>March 31, 2017</u>
Expert Discovery Disclosure	March 7, 2017	<u>April 12, 2017</u>
Rebuttal Expert Disclosure	March 21, 2017	<u>April 26, 2017</u>
Expert Discovery Cutoff	April 25, 2017	<u>May 5, 2017</u>

The parties have informed the Court that no motions for summary judgment will be filed in this case. All other case deadlines remain the same.

**IT IS SO ORDERED.**

Dated: January 25, 2017



ELIZABETH D. LAPORTE  
United States Magistrate Judge