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9 Attorneys for Plaintiff Yolanda Frausto

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13 YOLANDA FRAUSTO individually and as
14 successor in interest to the Estate of Decedent
15 John Anthony Cornejo;

16 Plaintiff,

17 vs.

18 CALIFORNIA HIGHWAY PATROL,
19 ALAMEDA COUNTY SHERIFF'S OFFICE,
20 KEVIN BEYRODT, NORMAN D. CORNEJO
21 II, and DOES 1 to 30, inclusive,

22 Defendants.

23 NORMAN CORNEJO, individually and as
24 successor in interest to the Estate of Decedent
25 John Anthony Cornejo;

26 Plaintiff,

27 vs.

28 COUNTY OF ALAMEDA, CALIFORNIA
HIGHWAY PATROL, KEVIN BEYRODT,
and DOES 1 to 50, inclusive,

Defendants.

CASE NO.: 3:16-CV-00311-RS and related
actions, Case No. 3:16-CV-00974-RS and No.
4:16-CV-03633-RS

**STIPULATION AND PROPOSED ORDER
FOR LEAVE TO TAKE DEPOSITIONS
AFTER NON-EXPERT DISCOVERY CUT
OFF**

1 The parties submit the following Joint Stipulation and request that the Court grant parties leave to
2 take depositions after the non-expert discovery cut off on December 5, 2016. Due to witness
3 availability parties do not have enough time to take the depositions of witnesses necessary for this case.
4 The additional depositions that need to be taken are as follows: California Highway Patrol's Persons
5 Most Knowledgeable, Corizon HealthCare's Person Most Knowledgeable and Dr. Maria Magat, these
6 depositions will be taken and completed within 15 days of the non-expert discovery cut off. This
7 request will not affect any of other deadlines.

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10 Therefore, the parties stipulate and request that the Court grant parties leave to take depositions
11 after the non-expert discovery cut off on December 5, 2016 and to be completed within 15 days.

12 **IT IS HEREBY STIPULATED BY THE PARTIES:**

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14 Dated: 11/17/16 By: /s/ Michael Bracamontes
15 Michael Bracamontes, Esq.¹
16 Michael A. Schreiber, Esq.
17 BRACAMONTES & VLASAK, P.C.
18 Attorneys for Plaintiff

19 Dated: 11/17/16 By: /s/ Craig Modlin
20 Craig Modlin, Esq.
21 Deputy Attorney General
22 Attorney for Defendants California Highway Patrol
23 & M. Diehl, Z. Trzesniewski, H. Schultz,
24 C. Bruno, D. Hazelwood, and J. Koven

25 Dated: 11/17/16 By: /s/ Gregory B. Thomas
26 Gregory B. Thomas, Esq.
27 BOORNAZIAN, JENSEN & GARTHE
28 Attorney for Defendants County of Alameda and
Kevin Beyrodt, Aaron Inns, Anthony Fields, Ian
Stewart, Karen Easing & Cameron Tracy

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2 Dated: 11/17/16

3 By: /s/ Nikolau W. Reed
4 Nikolaus W. Reed, Esq.
5 LAW OFFICES OF NIKOLAUS W. REED
6 Attorney for Plaintiff Norman Cornejo

7 Dated: 11/17/16

8 By: /s/ Logan Quirk
9 Logan Quirk, Esq.
10 QUIRK LAW GROUP
11 Attorney for Plaintiff Norman Cornejo.

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27 ¹ As the filer of this stipulation, I, Michael Bracamontes attest that Craig Modlin, Gregory B. Thomas,
28 Nikolaus W. Reed and Logan Quirk concur in the content of the Stipulation and have authorized its
filing.

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~~PROPOSED~~ ORDER

GOOD CAUSE APPEARING, it is ORDERED that Parties Joint Stipulation and request that the Court grant parties leave to take depositions after the non-expert discovery cut off on December 5, 2016 and to be completed within 15 days is GRANTED.

Dated: 11/21/16


Richard Seeborg
Northern District Court Judge