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8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN FRANCISCO DIVISION

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

14 Plaintiff,

15 vs.

16 CALIFORNIA HIGHWAY PATROL,
17 ALAMEDA COUNTY SHERIFF’S OFFICE,
18 KEVIN BEYRODT, NORMAN D. CORNEJO
19 II, AARON INNS, ANTHONY FIELDS, IAN
20 STEWART, K. EASLING, AND CAMERON
TRACY, and DOES 6 to 30, inclusive ,

21 Defendants.

CASE NO.: 3:16-CV-00311-RS AND
RELATED ACTIONS, CASE NO. 3:16-CV-
00974-RS, CASE NO. 16-CV-03633-RS,
CASE NO. 16-CV-03833-RS

**STIPULATION AND ~~PROPOSED~~ ORDER
FOR AN EXTENSION ON ALL EXPERT
DISCOVERY DEADLINES AND DEADLINE
FOR HEARING ON DISPOSITIVE
MOTIONS**

22
23 **RELATED ACTIONS**

1 The parties submit the following Joint Stipulation and request that the Court grant a two week
2 extension concerning all expert discovery deadlines including expert disclosures, expert reports, and
3 expert depositions. Due to scheduling conflicts, the parties do not have enough time to take the
4 deposition of experts necessary for this case. This request will also extend the deadline that dispositive
5 motions are to be heard by two weeks.

6 Therefore, the parties stipulate and request that the Court grant a two week extension for all expert
7 discovery deadlines and the deadline for hearing on dispositive motions.

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

9 Dated: 12/6/16 By: /s/ Michael Bracamontes
Michael Bracamontes, Esq.¹
10 Michael A. Schreiber, Esq.
11 BRACAMONTES & VLASAK, P.C.
Attorneys for Plaintiff

12 Dated: 12/6/16 By: /s/ Craig Modlin
13 Craig Modlin, Esq.
14 Deputy Attorney General
15 Attorney for Defendants California Highway Patrol
& M. Diehl, Z. Trzesniewski, H. Schultz,
16 C. Bruno, D. Hazelwood, and J. Koven

17 Dated: 12/6/16 By: /s/ Gregory B. Thomas
18 Gregory B. Thomas, Esq.
19 BOORNAZIAN, JENSEN & GARTHE
20 Attorney for Defendants County of Alameda and
Kevin Beyrodt, Aaron Inns, Anthony Fields, Ian
Stewart, Karen Easling & Cameron Tracy

21 Dated: 12/6/16 By: /s/ Nikolau W. Reed
22 Nikolaus W. Reed, Esq.
23 LAW OFFICES OF NIKOLAUS W. REED
Attorney for Plaintiff Norman Cornejo

24 Dated: 12/6/16 By: /s/ Logan Quirk
25 Logan Quirk, Esq.
26 QUIRK LAW GROUP
Attorney for Plaintiff Norman Cornejo.

27 _____
28 ¹ As the filer of this stipulation, I, Michael Bracamontes attest that Craig Modlin, Gregory B. Thomas, 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 the Parties' Joint Stipulation and request that the Court grant a two week extension concerning all expert discovery deadlines and the deadline for hearing on dispositive motions is GRANTED.

Dated: 12/7/16



Richard Seeborg
Northern District Court Judge