1	GREGORY B. THOMAS, ESQ. (SBN 239870) ADAM A. VUKOVIC, ESQ. (SBN 301392) SOPHIA V. COHN, ESQ. (SBN 306661)			
2				
3	BOORNAZIAN, JENSEN & GARTHE			
4	A Professional Corporation 555 12 <sup>th</sup> Street, Suite 1800			
	Oakland, CA 94607 Telephone: (510) 834-4350			
5	Facsimile: (510) 839-1897 gthomas@bjg.com			
6	avukovic@bjg.com scohn@bjg.com			
7	Attorneys for Defendant			
8	COUNTY OF ALAMEDA, sued herein as "ALAKEVIN BEYRODT, AARON INNS, ANTHON			
9	EASLING, sued herein as "K. EASLING," and			
10				
11	UNITED STATES DISTRICT COURT			
12	FOR THE NORTHERN DISTRICT OF CALIFORNIA			
13				
14	YOLANDA FRAUSTO individually and as ) successor in interest to the Estate of Decedent )	Case No.: 3:16-cv-00311-RS And Related Actions		
15	John Anthony Cornejo,	STIPULATION AND [PROPOSED]		
16	Plaintiffs,	ORDER EXTENDING EXPERT DISCOVERY CUT-OFF DEADLINE		
17	)	DISCOVERT COT-OFF DEADLINE		
18	VS. )			
19	CALIFORNIA HIGHWAY PATROL, ) ALAMEDA COUNTY SHERIFF'S OFFICE, )			
20	KEVIN BEYRODT, NORMAND D. ) CORNEJO, II, and DOES 1 to 30, inclusive, )			
21	Defendants.			
22	And Related Actions			
23	)			
24	The parties submit the following Joint Stipulation and request that the Court grant s			

The parties submit the following Joint Stipulation and request that the Court grant a one month extension of the expert discovery cut-off deadline, presently set for February 15, 2017. Due to expert availability and other scheduling conflicts, the parties do not have enough time to take the necessary expert depositions by that date. This request will not affect any other deadlines.

28

25

26

27

1	Therefore, the parties hereby stipulate and request that the Court grant an extension on the	
2	expert discovery cut-off deadline until March 17, 2017.	
3	Respectfully submitted,	
4	DATED: February 7, 2017	
5	BOORNAZIAN, JENSEN & GARTHE A Professional Corporation	
6		
7	By: <u>/s/ Gregory B. Thomas</u> GREGORY B. THOMAS, ESQ.  ADAM A. VUKOVIC, ESQ.	
8	SOPHIA V. COHN, ESQ. Attorneys for Defendant	
9	COUNTY OF ALAMEDA, sued herein as "ALAMEDA COUNTY	
11	SHERIFF'S OFFICE," KEVIN BEYRODT, AARON INNS,	
12	ANTHONEY FIELDS, IAN STEWART, KAREN EASLING, sued herein as "K. EASLING," and	
13	CAMERON TRACY	
14		
15	DATED: February 7, 2017 BRACAMONTES & VLASAK, P.C.	
16	By:/s/ Michael Bracamontes	
17	MICHAEL BRACAMONTES, ESQ.	
18	MICHAEL A. SCHREIBER, ESQ. Attorneys for Plaintiffs	
19	YOLANDA FRAUSTO NORMAN CORNEJO	
20		
21	DATED: February 7, 2017 CALIFORNIA ATTORNEY GENERAL	
22	By:/s/ Craig Modlin, Esq	
23	CRAIG MODLIN, ESQ.	
24	Attorney for Defendants CALIFORNIA HIGHWANT PATROL, M.	
25	DIEHL, Z. TRZESNIEWSKI, H. SCHULTZ, C. BRUNO, D. HAZELWOOD, and J.	
26	KOVEN	
27		
28	2	
	-2-	

1	<u>ATTESTATION</u>	
2	I, Gregory B. Thomas, am counsel for Record for Defendants County of Alameda, et al. I an	
3	the registered ECF user whose username and password are being used to file this stipulation. In	
4	compliance with Local Rule 5-1(i)(3), I hereby attest that the above-identified counsel concurred in	
5	this filing.	
6	Dated: February 7, 2017 BOORNAZIAN, JENSEN & GARTHE	
7	By: _/s/ Gregory B. Thomas	
8	GREGORY B. THOMAS Attorney for Defendants	
9	COUNTY OF ALAMEDA, sued herein as "ALAMEDA COUNTY SHERIFF'S	
10	OFFICE," KEVIN BEYRODT, AARON INNS, ANTHONEY FIELDS,	
11	IVAN STEWART, KAREN EASLING, sued herein as "K.	
12	EASLING," and CAMERON TRACY	
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		
26		
27		

28

1		
2	[PROPOSED] ORDER	
3	GOOD CAUSE appearing, it is ORDERED that Parties' Joint Stipulation and request that	
4	the Court grant an extension of the expert discovery cut-off deadline until March 17, 2017 is	
5	GRANTED.	
6	PURSUANT TO STIPULATION, IT IS SO ORDERED.	
7		
8	DATED: 2/8/17  HON. RICHARD SEEBORG	
9	Judge of the United States District Court	
10		
11		
12		
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		
26		
27		
28		