

1 Eugene B. Elliot, State Bar No. 111475
 2 Ethan M. Lowry, State Bar No. 278831
 3 Kate L. Brown, State Bar No. 308134
 4 BERTRAND, FOX, ELLIOT, OSMAN & WENZEL
 5 The Waterfront Building
 6 2749 Hyde Street
 7 San Francisco, California 94109
 8 Telephone: (415) 353-0999
 9 Facsimile: (415) 353-0990
 10 Email: eelliot@bfesf.com

11 Attorneys for Defendant
 12 SANTA ROSA CITY SCHOOL DISTRICT

13 UNITED STATES DISTRICT COURT

14 NORTHERN DISTRICT OF CALIFORNIA

15 JANE DOE NO. 59,

Case No. 3:16-cv-01256-WHO

16 Plaintiff,

**STIPULATION AND ORDER TO CONTINUE
 FACT AND EXPERT DISCOVERY CUTOFF**

17 v.

18 SANTA ROSA CITY SCHOOLS,

19 Defendants.

20 AND RELATED CROSS-ACTION.

Hon. William H. Orrick

21 **STIPULATION**

22 Defendant SANTA ROSA CITY SCHOOLS (the "DISTRICT") and plaintiff JANE DOE NO. 59
 23 by and through their respective attorneys of record, hereby stipulate as follows:

24 1. The Court originally assigned a Fact Discovery cutoff date of February 14, 2017. The
 25 Parties requested additional time to complete discovery on February 13, 2017. The Court granted the
 26 parties proposed stipulated Fact Discovery cutoff date of April 10, 2017.

27 2. Both parties require additional time to complete discovery. Trial is set for August 14,
 2017.

3. The DISTRICT intends to conduct the following further discovery: (1) depose the officers

1 involved in the incident. DOE intends to conduct the following further discovery: (1) depose
2 Defendant's District Representative(s) in accordance with Rule 30(b)(6), and (2) depose Lindsey
3 Apkarian.

4 4. The parties therefore respectfully request that the Court extend the Fact Discovery cutoff
5 date 14 days to April 24, 2017. This extension will not affect the trial date or any other dates previously
6 set by the Court. The parties' stipulation of extending the Fact Discovery cutoff is contingent on such an
7 extension not affecting the trial date.

8 5. Further, Defendant's expert is unable to provide a written report until April 28, 2017. The
9 parties respectfully request that the Court extend the Expert Discovery deadlines 14 days as follows: (1)
10 Expert Disclosure: April 28, 2017. This extension will not affect the trial date or any other dates
11 previously set by the Court. In fact, the parties' stipulation of extending the Discovery cutoff is
12 contingent on such an extension not affecting the trial date.

13 10. The parties respectfully request that the Court approve this stipulation and incorporate its
14 terms in an Order.

15 Dated: April 10, 2017

BERTRAND, FOX, ELLIOT, OSMAN & WENZEL

17 By: /s/ Ethan Lowry
18 Eugene B. Elliot
19 Ethan M. Lowry
20 Kate L. Brown
21 Attorneys for Defendant
SANTA ROSA CITY SCHOOL DISTRICT

22 Dated: April 10, 2017

HERMAN LAW

23 By: /s/ Arick Fudali
24 Arick Fudali, Esq. (Calf. Bar No. 296364)
25 Daniel G. Ellis, Esq. (Calf. Bar No. 298639)
26 Attorneys for Plaintiff
27 JANE DOE NO. 59
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

ATTORNEY ATTESTATION

I hereby attest that I have on file all holograph signatures for any signatures indicated by a conformed signature (“/s/”) within this E-filed document or have been authorized by all parties to show their signature on this document as /s/.

Dated: April 10, 2017

By: /s/ Ethan Lowry
Ethan M. Lowry

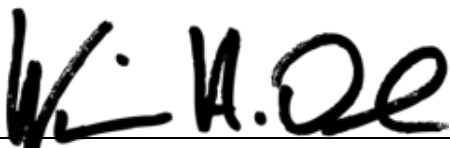
1 **ORDER**

2 GOOD CAUSE APPEARING THEREFORE, and the parties' having stipulated to the same, the
3 parties' stipulation is hereby APPROVED. The Fact Discovery cutoff currently set for April 10, 2017 is
4 continued 14 days to April 24, 2017. This extension will not alter or affect the trial date or any other
5 dates previously set by the Court.

6 Expert Discovery deadlines are continued 14 days as follows: (1) Expert Disclosure: April 28,
7 2017. This extension will not affect the trial date or any other dates previously set by the Court.

8
9 **IT IS SO ORDERED.**

10 Dated: April 10, 2017

11 
12 _____
13 William H. Orrick
14 UNITED STATES DISTRICT JUDGE