GREGORY J. BROD, CSB 184456 1 BROD LAW FIRM, P.C. 96 Jessie Street 2 San Francisco, California 94105 3 Telephone (415) 397-1130 Facsimile (415) 397-2121 4 MARKUS WILLOUGHBY, CSB 197478 5 WILLOUGHBY LAW FIRM, INC. 6 1814 Franklin Street, Suite 800 Bryce Lemmon Paksanon GAC 946tVet al Doc. 10 Telephone: (510) 451-2777 Facsimile: (510) 835-1050 8 9 Attorneys for Plaintiff **BRYCE LEMMONS** 10 11 UNITED STATES DISTRICT COURT 12 NORTHERN DISTRICT OF CALIFORNIA 13 14 15 BRYCE LEMMONS, Case No. 3:16-CV-04553 WHO 16 17 Plaintiff, STIPULATED REQUEST FOR LEAVE 18 OF COURT ALLOWING AMENDMENT VS. TO COMPLAINT AND REQUEST FOR 19 **CONTINUANCE OF INITIAL DISCLOSURE DEADLINES; PROPOSED** 20 COUNTY OF SONOMA, CALIFORNIA **ORDER** 21 FORENSICS MEDICAL GROUP, INC., CITY OF SANTA ROSA, and DOES 1 22 through 200, 23 24 Defendants. Pursuant to F.R.C.P. 15(a) and Local Civil Rule 6-3, Plaintiff BRYCE LEMMONS, 25 Defendant COUNTY OF SONOMA, Defendant CALIFORNIA FORENSIC MEDICAL GROUP, 26 27 INC., and Defendant CITY OF SANTA ROSA, by and thorough their respective attorneys, 28 STIPULATED REQUEST FOR LEAVE OF COURT ALLOWING AMENDMENT TO COMPLAINT AND REQUEST

FOR CONTINUANCE OF INITIAL DISCLOSURE DEADLINES

jointly stipulate to the following:

- Plaintiff BRYCE LEMMONS shall be allowed to amend his COMPLAINT FOR DAMAGES, filed August 11, 2016, within 5 days of this Court's order;
- 2. The parties have agreed to informally and simultaneously exchange all documents in their respective possession which support the claims and defenses in this action, prior to the F.R.C.P. 26(a)(1) Initial Disclosures. This exchange does not waive the rights of any party to identify or produce further documents at the time of the Initial Disclosures.
- The parties respectfully request a continuance of the deadlines regarding Initial
   Disclosures, as set forth in this Court's August 11, 2016 ORDER SETTING INITIAL

   CASE MANAGEMENT CONFERENCE AND ADR DEADLINES.
- 4. Defendant CALIFORNIA FORENSIC MEDICAL GROUP, INC. has been inadvertently named as "CALIFORNIA FORENSICS MEDICAL GROUP, INC.".
  The corrected name of Defendant CALIFORNIA FORENSIC MEDICAL GROUP, INC. shall be inserted wherever CALIFORNIA FORENSICS MEDICAL GROUP, INC. appears in the Complaint for Damages, and the corrected name shall be used in plaintiffs' First Amended Complaint for Damages.

IT IS SO STIPULATED.

DATED: October  $\frac{5}{2}$ , 2016

BROD LAW FIRM, P.C.

GREGORY J. BROD

Attorneys for Plaintiff BRYCE LEMMONS

DATED: October <b>5</b> , 2016	WILLOUGHBY LAW FIRM, INC.
	By Abus S M
	MARKUS WILLOUGHBY Attorneys for Plaintiff BRYCE LEMMONS
DATED: October 3, 2016	SENNEFF, FREEMAN & BLUESTONE, LI
	Approved 10/3/16 for electronic filing:
	By /Bonnie A. Freeman/
	By /Bonnie A. Freeman/ BONNIE A FREEMAN Attorneys for Defendant COUNTY OF
	SONOMA
DATED: October $3$ , 2016	CITY OF SANTA ROSA CITY ATTORNEY'S OFFICE
	By Oh
	JOHN J. FRITSCH Attorneys for Defendant
	CITY OF SÅNTA ROSA
DATED: October, 2016	LAW OFFICES OF JEROME M. VARANIN
	Ву
	JEROME M. VARANINI Attorneys for Defendant CALIFORNA
	FORENSIC MEDICAL GROUP, INC.
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II.	

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4	DATED: October, 2016	WILLOUGHBY LAW FIRM, INC.	
5			
6		Ву	
7		MARKUS WILLOUGHBY Attorneys for Plaintiff BRYCE LEMMONS	
8			
9	DATED: October, 2016	SENNEFF, FREEMAN & BLUESTONE, LLP	
10			
11		Ву	
12		BONNIE A FREEMAN Attorneys for Defendant COUNTY OF	
13		SONOMA	
14			
15	DATED: October, 2016	CITY OF SANTA ROSA CITY ATTORNEY'S OFFICE	
16		ATTORNET SOFFICE	
17			
18		JOHN J. FRITSCH	
19		Attorneys for Defendant CITY OF SANTA ROSA	
20			
21	DATED: October 7, 2016	LAW OFFICES OF JEROME M. VARANINI	
22			
23		By /s/ Jerome M. VAranini JEROME M. VARANINI	
24		Attorneys for Defendant CALIFORNA FORENSIC MEDICAL GROUP, INC.	
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27	//		
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	STIPULATED REQUEST FOR LEAVE OF COURT ALLOWING AMENDMENT TO COMPLAINT AND REQUEST FOR CONTINUANCE OF INITIAL DISCLOSURE DEADLINES - 3		

## [PROPOSED] ORDER

Pursuant to the stipulation of the parties and good cause having been shown, Plaintiff BRYCE LEMMONS is granted leave of Court to file his First Amended Complaint by October 18, 2016 \_\_\_\_.

The initial Case Management Conference, previously set for December 8, 2016, is continued until \_\_January 24, 2017 at 2:00 PM \_\_. The deadlines associated with the Initial Case Management Conference are to be re-calendared by this Court according to the new date. IT IS SO ORDERED.

DATED: October 13, 2016

HON. WILLIAM H. ORRICK UNITED STATES DISTRICT JUDGE

STIPULATED REQUEST FOR LEAVE OF COURT ALLOWING AMENDMENT TO COMPLAINT AND REQUEST FOR CONTINUANCE OF INITIAL DISCLOSURE DEADLINES