

1 Jianlin Song (SBN 289226)  
 2 [Jianlin.Song@wilsonelser.com](mailto:Jianlin.Song@wilsonelser.com)  
 3 Peter Catalanotti (SBN 230743)  
 4 [Peter.Catalanott@wilsonelser.com](mailto:Peter.Catalanott@wilsonelser.com)  
 5 Jenny Chien (SBN 327918)  
 6 [Jenny.Chien@wilsonelser.com](mailto:Jenny.Chien@wilsonelser.com)  
 7 WILSON, ELSER, MOSKOWITZ,  
 8 EDELMAN & DICKER LLP  
 9 525 Market Street, 17th Floor  
 10 San Francisco, California 94105  
 11 Telephone: (415) 433-0990  
 12 Facsimile: (415) 434-1370

13 Attorneys for Cross-Defendant  
 14 HEALTHRIGHT 360 (erroneously sued as HEALTHRIGHT 360, INC.)

15 **UNITED STATES DISTRICT COURT**  
 16 **NORTHERN DISTRICT OF CALIFORNIA**

17 ADAM CHAITIN-LEFCOURT,

18 Plaintiff,

19 vs.

20 CITY AND COUNTY OF SAN  
 21 FRANCISCO, a political subdivision of the  
 22 State of California, SAN FRANCISCO  
 23 POLICE DEPARTMENT; SFPD OFC  
 24 CHRISTOPHER M. DUNNE #1775; SFPD  
 25 OFC NASER #4289; SFPD OFC CHEW  
 26 #2088; SFPD OFC TOM #621; SFPD OFC  
 27 CHAVARIN #77; ANOTHER PLANET  
 28 ENTERTAINMENT, LLC; ADMIRAL  
 SECURITY SERVICES, INC.; ASHLEY  
 SAJLIAGA SALMIA; and DOES I through X,  
 inclusive,

Defendants.

ANOTHER PLANET ENTERTAINMENT,  
 LLC,

Cross-complainant,

vs.

IPS SECURITY, INC.; HEALTHRIGHT 360,  
 INC. and DOES 1 to 50, inclusive,

Cross-defendants.

Case No. 3:20-cv-05822-RS

**JOINT STIPULATION TO AMEND  
 INITIAL CASE MANAGEMENT  
 SCHEDULING ORDER AND  
 ORDER**

Complaint filed: August 18, 2020

Judge: Hon. Richard Seeborg

1 On August 19, 2021, this Court issued an Initial Case Management Scheduling Order setting  
2 this case for trial (Docket No. 66). The Court set trial to commence on October 3, 2022 at 9:00  
3 a.m., and a final pretrial conference on September 21, 2022 at 10:00 a.m. The Court also set all  
4 corresponding pretrial deadlines.

5 On November 23, 2021, Cross-Defendant HealthRight 360 (“HR 360”) and Cross-  
6 Complainant Another Planet Entertainment, LLC (“Another Planet”) filed a Stipulation to Set Aside  
7 Default Judgment and to Deem HR 360’s Answer to Cross-Complaint Filed. (Docket No. 70) On  
8 November 24, 2021, the Court granted the said Stipulation and vacated default judgment against  
9 HR 360. (Docket No. 71)

10 As HR 360 has just joined this action, all parties in this action have stipulated to amend the  
11 Court’s Initial Case Management Scheduling Order to extend the trial date, pretrial conference date,  
12 and all pretrial deadlines by a period of 90 days.

13 IT IS HEREBY STIPULATED, by and among all parties in this action, through their  
14 respective counsel of record, that the trial dates and pretrial deadlines be continued as follows:

- 15 1. The parties agree that fact discovery cutoff date is extended to July 15, 2022;
- 16 2. The parties agree that expert designation deadline is extended to August 15, 2022;
- 17 3. The parties agree that supplemental and rebuttal expert designation deadline is extended  
18 to September 12, 2022;
- 19 4. The parties agree that expert discover cutoff date is extended to October 3, 2022;
- 20 5. The parties agree that a further Case Management Conference is extended to July 21,  
21 2022 at 10:00 a.m., or on any later date at the Court’s convenience;
- 22 6. The parties agree that dispositive pretrial motions, including motion for summary  
23 judgment, shall be heard no later than October 27, 2022;
- 24 7. The parties agree that the final pretrial conference shall be held on December 21, 2022 at  
25 10:00 a.m., or on any later date at the Court’s convenience;
- 26 8. The parties agree that a jury trial shall commence on January 3, 2023 at 9:00 a.m., or on  
27 any later date at the Court’s convenience.

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**IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD SIGNED BELOW:**

Dated: January 7, 2022

WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER  
LLP

By: /s/ Jianlin Song  
Jianlin Song, Esq.  
Peter Catalanotti, Esq.  
Jenny Chien, Esq.  
Attorneys for Cross-Defendant  
HEALTHRIGHT 360, INC  
E-signature authorized on Jan 7, 2022

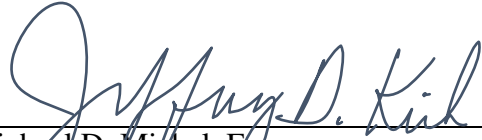
Dated: January 7, 2022

KERN SEGAL & MURRAY

By: /s/ Phillip Segal  
Phillip Segal Esq.  
Attorney for Plaintiff  
Adam Chaitin-Lefcourt  
E-signature authorized on Jan 7, 2022

Dated: January 6, 2022

MICHEL & FACKLER

By:   
Michael D. Michel, Esq.  
Jeffrey D. Kirk, Esq.  
Attorneys for Cross-complainant  
ANOTHER PLANET ENTERTAINMENT

Dated: January 7, 2022

OFFICE OF THE CITY ATTORNEY

By: /s/ Ryan Stevens  
Ryan Stevens, Esq.  
Attorney for Defendant and Cross-Complainant  
City and County of San Francisco  
E-signature authorized on Jan 7, 2022

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Dated: January 7, 2022

KASEM, KO & AHMED

By: /s/ Ahmed Kasem

Ahmed Kasem  
Attorney for Defendant  
Admiral Security Inc.  
E-signature authorized on Jan 7, 2022


**ORDER**

The Court, having considered the STIPULATION and having found GOOD CAUSE  
APPEARING,

**IT IS HEREBY ORDERED THAT:**

The Initial Case Management Scheduling Order is amended and the trial date and all pretrial  
deadlines set forth therein are extended as the parties have stipulated.

Dated: January 7, 2022

By:   
Honorable Richard Seeborg  
Chief United States District Judge