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6 Attorneys for Defendants
7 COUNTY OF SAN MATEO et al.

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10 UNITED STATES DISTRICT COURT
11
12 NORTHERN DISTRICT OF CALIFORNIA

13 GEOFFREY BRADWAY,

14 Plaintiff,

15 vs.

16 COUNTY OF SAN MATEO; OWEN GRABAR;
17 JOHN CARROLL; CHARLES TITUS; SEAN
18 LUNDIN-WESTON; DAVID LOMU; LUIS RIOS;
19 [FIRST NAME UNKNOWN] BRANDT; [FIRST
20 NAME UNKNOWN] SOARES; GARRETT PENE,

21 Defendants

22 Case No. 25-cv-06918-AGT

23 **STIPULATION AND [PROPOSED] ORDER
24 TO EXTEND PLAINTIFF'S TIME TO FILE
25 AN AMENDED COMPLAINT**

26
27
28 THE HONORABLE ALEX G. TSE

1 Pursuant to Civil Local Rule 6-2, the Parties stipulate and hereby ask the Court to extend the
2 deadline for Plaintiff to file an amended complaint. In the Court's November 5, 2025, Order granting in
3 part and denying in part the Defendants' motion to dismiss, the Court ordered Plaintiff to file an amended
4 complaint by December 5, 2025. (Docket No. 23.) **The Parties stipulate to and request a two-week**
5 **extension of this deadline to December 19, 2025. The Parties also stipulate to and request an**
6 **extension of the Defendants' deadline to respond to January 9, 2025.**

7 In an effort to move the litigation forward, Counsel for Defendants have reviewed and produced
8 body-worn camera footage of the incident at issue. There is a significant volume of footage, and
9 Plaintiff's Counsel would like additional time to review it before filing any amended complaint.
10 Defendants' Counsel offered to stipulate to an extension because it was unable to get the footage to
11 Plaintiff's Counsel before Thanksgiving, and it will benefit all Parties and the Court to have more
12 informed pleadings. The Parties additionally stipulate to and request an extension of Defendants'
13 deadline to respond from 14 days to 21 days after service of the amended complaint (see F.R.C.P.
14 15(a)(3)) to account for the holidays, office closures, and planned and paid-for travel of counsel.

15 Previously, the Parties stipulated to extend Defendants' time to respond to the original Complaint
16 by one week. (Docket No. 11.) That is the only extension so far in this case. This requested extension
17 will not alter the date of any event or any deadline already fixed by Court order.

18 **IT IS SO STIPULATED.**

1 Dated: December 4, 2025

Respectfully submitted,

2 JOHN D. NIBBELIN, COUNTY COUNSEL

3
4 By: 
5 Lauren F. Carroll, Deputy

6 Attorneys for Defendants
7 COUNTY OF SAN MATEO

8
9 Dated: December 4, 2025

10 By: 
11 Nicholas F. Scardigli

12 Attorney for Plaintiff
13 GEOFFREY BRADWAY

14
15 PURSUANT TO STIPULATION, IT IS SO ORDERED.

16 DATED: 12/5/2025



17
18 Honorable Alex G. Tse
19 United States District Judge