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8 Attorneys for Defendants  
 CITY AND COUNTY OF SAN FRANCISCO (including  
 9 SAN FRANCISCO POLICE DEPARTMENT),  
 GREG SUHR, CRAIG TIFFE, and ERIC REBOLI

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 15 (Additional Counsel for Plaintiffs on following page)

16 Attorneys for Plaintiffs  
 ESTATE OF AMILCAR PEREZ LOPEZ, JUAN PEREZ,  
 17 MARGARITA LOPEZ PEREZ

18 UNITED STATES DISTRICT COURT

19 NORTHERN DISTRICT OF CALIFORNIA

20 ESTATE OF AMILCAR PEREZ LOPEZ, by  
 and through successors in interest, JUAN  
 21 PEREZ and MARGARITA LOPEZ PEREZ;  
 JUAN PEREZ, individually; MARGARITA  
 22 LOPEZ PEREZ, individually,

23 Plaintiffs,

24 vs.

25 CHIEF OF POLICE GREG SUHR; CITY  
 AND COUNTY OF SAN FRANCISCO; SAN  
 26 FRANCISCO POLICE DEPARTMENT;  
 OFFICER CRAIG TIFFE (Badge No. 1312);  
 27 OFFICER ERIC REBOLI (Badge No. 1651),  
 and DOES 1 to 10,

28 Defendants.

Case No. 15-cv-01846 HSG

**STIPULATION REGARDING DISCOVERY  
 DISPUTE JOINT LETTER CONCERNING  
 DEFENDANTS' MOTION FOR DISCOVERY  
 SANCTIONS OR ALTERNATIVELY TO  
 COMPEL DEPOSITION TESTIMONY  
 PLAINTIFFS AND EXTEND DEADLINES  
 FOR EXPERT DISCLOSURE AND  
 DISCOVERY RELATED TO PLAINTIFFS'  
 DAMAGES**

Trial Date: March 26, 2018

1 Additional Counsel for Plaintiffs:

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1 WHEREAS, a discovery dispute exists regarding the Plaintiffs' failure to appear for their  
2 depositions on June 29 and June 30, 2017.

3 WHEREAS, fact discovery cutoff in this case was June 30, 2017, and the last day for filing a  
4 motion to compel fact discovery is July 7, 2017. Dkt. 78, LR 37-3.

5 WHEREAS, on June 26, 2017, defense counsel initiated efforts to meet and confer about the  
6 Plaintiffs' failure to appear for their depositions. In response, plaintiff's counsel proposed a  
7 conference on July 3, 2017, but defense counsel was unavailable due to the holiday weekend and  
8 instead proposed July 5 or July 6, 2017 to meet and confer. Plaintiffs' counsel did not respond to that  
9 proposal by the morning of July 5, 2017, and so defense counsel sent a proposed draft of a joint letter,  
10 advised that Defendants' would be filing the letter on July 7, 2017, and requested that Plaintiffs add  
11 their position to the draft in order to file a joint letter.

12 WHEREAS, on the night of July 6, 2017 plaintiff's counsel advised he would be available on  
13 the morning of July 7, 2017 to meet and confer regarding this discovery dispute. Plaintiff and defense  
14 counsel spoke by telephone on the morning of July 7, 2017, at which time plaintiffs' counsel requested  
15 until Monday, July 10, 2017, to provide plaintiffs' portion of the discovery dispute joint letter.

16 The undersigned parties, through counsel, STIPULATE and AGREE that plaintiffs' counsel  
17 has until noon on Monday, July 10, 2017 in which to provide defense counsel their portion of the  
18 discovery dispute joint letter regarding Defendants' Motion for Discovery Sanctions or Alternatively  
19 to Compel Deposition Testimony Plaintiffs and Extend Deadlines for Expert Disclosure and Discovery  
20 Related to Plaintiffs' Damages. If plaintiffs have not provided defense counsel with their portion of

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1 the letter by noon on July 10, 2017, Defendants shall file their discovery dispute letter independently.

2 **IT IS SO STIPULATED.**

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4 Dated: July 7, 2017

DENNIS J. HERRERA  
City Attorney  
CHERYL ADAMS  
Chief Trial Deputy  
SEAN F. CONNOLLY  
JAMES F. HANNAWALT  
Deputy City Attorney

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9 By: /s/ James F. Hannawalt

SEAN F. CONNOLLY  
JAMES F. HANNAWALT  
Attorneys for Defendants  
CITY AND COUNTY OF SAN FRANCISCO (including  
SAN FRANCISCO POLICE DEPARTMENT),  
GREG SUHR, CRAIG TIFFE, AND ERIC REBOLI

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11  
12 Dated: July 7, 2017

CASILLAS, MORENO & ASSOCIATES

13  
14 By: /s/ Arnoldo Casillas


ARNOLDO CASILLAS  
DENISSE O. GASTÉLUM

15  
16 Attorneys for Plaintiffs  
ESTATE OF AMILCAR PEREZ LOPEZ, BY AND  
THROUGH SUCCESSORS IN INTEREST, JUAN  
PEREZ AND MARGARITA LOPEZ PEREZ; JUAN  
PEREZ, INDIVIDUALLY; MARGARITA LOPEZ  
PEREZ, INDIVIDUALLY

**ORDER**

1           Based on the above stipulation, and for good cause appearing, IT IS ORDERED that plaintiffs'  
2 counsel has until noon on Monday, July 10, 2017 in which to provide defense counsel their portion of  
3 the discovery dispute joint letter regarding Defendants' Motion for Discovery Sanctions or  
4 Alternatively to Compel Deposition Testimony Plaintiffs and Extend Deadlines for Expert Disclosure  
5 and Discovery Related to Plaintiffs' Damages. If plaintiffs have not provided defense counsel with  
6 their portion of the letter by noon on July 10, 2017, Defendants shall file their discovery dispute letter  
7 independently.  
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10 Dated: July 7, 2017

  
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THE HONORABLE HAYWOOD S. GILLIAM JR.  
UNITED STATES DISTRICT JUDGE