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13 Attorneys for Defendant  
 14 OFFICER DENNIS MALLY

15 UNITED STATES DISTRICT COURT  
 16 NORTHERN DISTRICT OF CALIFORNIA

17 RON FRANKLIN, an individual

Case No. 4:17-cv-00789-HSG

18 Plaintiff,

19 v.

**STIPULATION AND ORDER TO EXTEND  
 EXPERT DISCOVERY DEADLINES**

20 CITY OF SAN LEANDRO, a municipal  
 21 corporation; DENNIS MALLY, individually  
 22 and in his capacity as an officer for the San  
 23 Leandro Police Department; and DOES 1-25,  
 24 inclusive, individually, jointly and severally,

25 Defendants.

**Hon. Haywood S. Gilliam, Jr.**

26 Pursuant to Federal Rules of Civil Procedure Rule 16(b)(4), and the Scheduling Order issued by  
 27 United States District Judge Haywood S, Gilliam Jr. on September 27, 2018 (the "Scheduling Order"),  
 28 (Dkt. No. 37.) Plaintiff RON FFRANKLIN and Defendant DENNIS MALLY by and through  
 undersigned counsel, hereby jointly stipulate and move to extend expert discovery deadlines for good  
 cause as follows:

1 Pursuant to the Scheduling Order, the cut-off for:

- 2 • Exchange of opening expert reports is March 12, 2019.
- 3 • Exchange of rebuttal expert reports is March 27, 2019.
- 4 • Close of expert discovery is April 11, 2019.

5 2. The parties have met and conferred and agree that an additional 30 days extension is  
6 necessary to permit the parties to sufficiently complete expert discovery.

7 3. This is the first request to continue expert discovery deadlines. This extension will not  
8 affect the trial date or any other dates previously set by the Court.

9 4. For the reasons set forth above, the parties respectfully request that this Court continue the  
10 previously set expert discovery deadlines as follows:

- 11 • Exchange of opening expert reports to April 11, 2019.
- 12 • Exchange of rebuttal expert reports to April 26, 2019.
- 13 • Close of expert discovery to May 10, 2019.

14 IT IS SO STIPULATED AND REQUESTED THROUGH THE PARTIES' COUNSELS OF  
15 RECORD.

16  
17 Dated: March 8, 2019

BERTRAND, FOX, ELLIOT, OSMAN & WENZEL

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19 By:           /s/ Joanne Tran          

Gregory M. Fox  
Joanne Tran  
Heidi Kim  
Attorneys for Defendant  
OFFICER DENNIS MALLY

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22  
23 Dated: March 8, 2019

LAW OFFICES OF JOHN L. BURRIS

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25 By:           /s/ K. Chike Odiwe          

John L. Burris  
DeWitt Lacy  
K. Chike Odiwe  
Attorneys for Plaintiff  
RON FRANKLIN

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**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 Plaintiff’s counsel to show their signature on this document as /s/.

Dated: March 8, 2019

By:     /s/ Joanne Tran      
Joanne Tran

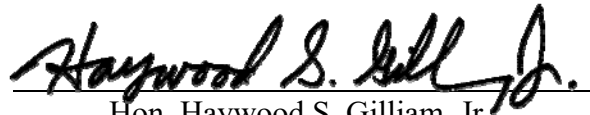
1 **ORDER**

2 GOOD CAUSE APPEARING THEREFORE, and the parties' having stipulated to the same, the  
3 following deadlines have been extended to 30 days:

- 4 • Exchange of opening expert reports is April 11, 2019
- 5 • Exchange of rebuttal expert reports is April 26, 2019.
- 6 • Close of expert discovery is May 10, 2019.

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8 IT IS SO ORDERED.

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11 Dated: March 11, 2019

  
12 Hon. Haywood S. Gilliam, Jr.  
13 UNITED STATES DISTRICT JUDGE  
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