

COSTANZO LAW FIRM  
111 N. MARKET STREET #910  
SAN JOSE, CA 95113

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16 Attorneys for ALLISON ROSS

17 UNITED STATES DISTRICT COURT, N.D. CALIFORNIA,  
18 SAN JOSE DIVISION

19 ALLISON ROSS,  
20 Plaintiff,  
21 vs.  
22 SANTA CLARA COUNTY SHERIFF'S  
23 DEPARTMENT; SHERIFF LAURIE SMITH;  
24 DEPUTY CARY COLLA; DEPUTY PAULO  
25 CONTRERAS; DEPUTY JEFF A. JORDAHL;  
26 DEPUTY RICHARD ROWE; DEPUTY R.  
27 LOPEZ; DEPUTY C. SIMS; SERGEANT  
28 BENNER; SERGEANT ROWBERRY;  
DEPUTY OBERDORTER; DEPUTY  
RUMLEY; DEPUTY McROBERTS; DEPUTY  
PALONOV; COUNTY OF SANTA CLARA;  
and DOES 1 through 20, INCLUSIVE,  
  
Defendants

Case No.: 14-CV-01770- EJD

**STIPULATION AND REQUEST  
FOR ORDER CHANGING TIME;  
~~PROPOSED~~ ORDER;  
DECLARATION OF LORI  
COSTANZO IN SUPPORT**

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**ORDER**

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The Court has considered the Stipulation and request by the parties to change the time of the set forth in the court’s Case Management Order (Docket No. 20). The Court having determined that the request is properly supported, hereby makes the following Order:

The Case Management Order is modified to reflect the following:

|  |                              |
|--|------------------------------|
| Fact Discovery Cut-Off   | August 6, 2015               |
| Designation of Opening Experts with Reports  | September 4, 2015            |
| Designation of Rebuttal Experts with Reports   | September 21, 2015           |
| Expert Discovery Cutoff  | September 28, 2015           |
| Deadline(s) for Filing Discovery Motions   | See Civil Local Rules        |
| Hearing on Anticipated Dispositive Motions   | 9:00 a.m. on October 1, 2015 |
| Trial Setting Conference   | 11:00 a.m. on July 16, 2015  |
| Joint Trial Setting Conference Statement (see Section (C)(2) of Standing Order for Civil Case) | July 6, 2015                 |

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Dated: January 2, 2015

By:   
EDWARD J. DAVILA  
U.S. District Court Judge

**DECLARATION OF LORI COSTANZO**

I, Lori Costanzo, declare:

1. I am an attorney with the Costanzo Law Firm, attorneys of record for Plaintiff herein. I am licensed to practice law before the courts of the State of California and I am admitted to practice in the United States District Court for the Northern District of California.

2. I know the facts herein stated of my own personal knowledge and if called upon to do so, I could competently testify to them under oath.

3. Plaintiff's Second amended Complaint was recently filed on December 26, 2014.

4. Defendants have not yet filed an Answer or other responsive pleading to Plaintiff's Second Amended Complaint.

5. Plaintiff's deposition is scheduled to be taken on January 5, 2015.

6. Plaintiff needs to obtain copies of each individual defendant's personnel file before taking their depositions, and will likely have to file a motion to do so.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on December 30, 2014, at San Jose, California.

Dated: December 30, 2014

COSTANZO LAW FIRM and the  
LAW OFFICES OF B J FADEM &  
ASSOCIATES

By: /s/ \_\_\_\_\_

Lori J. Costanzo  
Attorneys for Plaintiff, ROSS

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