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 11 BLAIR REDMOND

12 **UNITED STATES DISTRICT COURT**  
 13 **NORTHERN DISTRICT OF CALIFORNIA**  
 14 **SAN JOSE DIVISION**

15 BLAIR REDMOND,  
 16 Plaintiff,  
 17 v.  
 18 CITY OF SAN JOSE, SAN JOSE POLICE  
 19 DEPARTMENT, OFFICER TONY DIEP,  
 20 OFFICER DANIEL PFIEFER, OFFICER  
 21 MATTHEW BLACKERBY, SERGEANT  
 22 RICHARD GALEA, SERGEANT DONALD  
 23 PERRIER, OFFICER WENDY HOSKIN,  
 24 OFFICER ALAN MISHAGA, and OFFICER  
 25 ANDREW WONG, inclusive,  
 26 Defendants.

Case Number: 5:14-cv-02345 BLF

**STIPULATION TO DISCOVERY AND  
 EXPERT CUTOFF DATES AND  
 DEADLINES; [PROPOSED] ORDER**

27 TO THE COURT AND TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

28 The parties, by and through their respective counsel, stipulate to the below agreed dates and  
 deadlines:

EVENT	DATE OR DEADLINE
Last Day to Amend Pleadings or Add Parties	November 16, 2016
Fact Discovery Cut-Off	February 10, 2017
Last Day to Disclose Experts by the party with the burden of proof	April 28, 2017
Last Day to Disclose Rebuttal Expert Reports	May 31, 2017
Expert Discovery Cut-Off	June 30, 2017
Last Day to file Motion for Summary Judgment (FRCP 56(b))	July 30, 2017

All other dates are as scheduled in the Case Management Order filed January 21, 2016 [Document No. 96].

Dated: April 15, 2016

LECLAIR RYAN LLP

By: /s/ Patricia L. Peden  
 Patricia Peden, Esq.  
 Felicia Jafferries, Esq.  
 Jamie Cheng, Esq.

Attorneys for Plaintiff BLAIR REDMOND

Dated: April 15, 2016

RICHARD DOYLE, City Attorney

By: /s/ Nkia D. Richardson  
 NKIA D. RICHARDSON  
 Senior Deputy City Attorney

Attorneys for Defendants  
 CITY OF SAN JOSE, et al.

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**DECLARATION OF CONSENT**

Pursuant to General Order No. 45, Section X9B) regarding signatures, I attest under penalty of perjury that the concurrence in the filing of this document has been obtained from Defendants the City of San Jose, San Jose Police Department, et al.

/s/ Felicia P. Jafferries  
Felicia P. Jafferries

**CERTIFICATE OF SERVICE**

The undersigned certifies that on this 15<sup>th</sup> day of April, 2016, the foregoing STIPULATION TO DISCOVERY AND EXPERT CUTOFF DATES AND DEADLINES; [PROPOSED] ORDER was filed electronically using the Court’s ECF system, which will electronically serve the same upon all counsel of record.

/s/ Adriana L. Lawrence  
Adriana L. Lawrence

**ORDER**

IT IS HEREBY ORDERED that the following agreed to schedule shall apply in this case:

<b>EVENT</b>	<b>DATE OR DEADLINE</b>
Last Day to Amend Pleadings or Add Parties	November 16, 2016
Fact Discovery Cut-Off	February 10, 2017
Last Day to Disclose Experts by the party with the burden of proof	April 28, 2017
Last Day to Disclose Rebuttal Expert Reports	May 31, 2017
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Last Day to file Motion for Summary Judgment (FRCP 56(b))	July 30, 2017

All other dates are as scheduled in the Case Management Order filed January 21, 2016  
[Document No. 96].

IT IS SO ORDERED.

Dated: April 18, 2016

  
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HONORABLE BETH LABSON FREEMAN