1	JAMES McMANIS (40958)	
2	TYLER ATKINSON (257997) HILARY WEDDELL (293276)	
3	McMANIS FAULKNER 50 W. San Fernando Street, 10th Floor	
4	San Jose, CA 95113 Telephone: (408) 279-8700	
5	Facsimile: (408) 279-3244 tatkinson@mcmanislaw.com	
6	Attorneys for Plaintiff,	
7	SHIOW-HUEY CHANG	
8	UNITED STATES	DISTRICT COURT
9	NORTHERN DISTR	ICT OF CALIFORNIA
10	SAN JOSE	E DIVISION
11	SHIOW-HUEY CHANG,	Case No. Case No. 15-cv-02502 RMW (NC)
12	Plaintiff,	STIPULATION TO EXTEND DISCOVERY DEADLINE; <del>[PROPOSED]</del>
13	VS.	ORDER
14	COUNTY OF SANTA CLARA, a public entity, SANTA CLARA COUNTY	
15	SHERIFF'S OFFICE, a department of the County of Santa Clara, DEPUTY DANIEL J.	
16	FOREST, an individual, DEPUTY STRICKLAND, an individual, and DOES 1-	
17	50, inclusive,	
18	Defendants.	
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21	Pursuant to Federal Rules of Civil Proce	edure, Rule 29, and Civil Local Rules 6-2 and 7-
22	12, Plaintiff, Shiow-Huey Chang, and Defendan	
23	discovery cut-off in this case. Under the Order	_
24	current fact discovery deadline is November 25,	, 2015. The parties request the deadline be
25	extended to February 18, 2016.	
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	STIPULATION TO EXTEND DISCOVERY DEADLIN Case No.: 15-cv-02502 RMW (NC)	E; [PROPOSED] ORDER;
		Dockets.Justia
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1	REASONS FOR ENLARGEMENT OF TIME
2	This action commenced on June 5, 2015. Defendants filed an answer to the complaint on
3	July 1, 2015. The Initial Case Management Conference ("initial CMC") was held on September
4	14, 2015.
5	The parties sought discovery at their earliest opportunity, and discovery has continued in
6	earnest. Pursuant to the Court's order following the initial CMC, fact discovery is scheduled to
7	close next month. However, the parties believe their preparation for trial would benefit from
8	additional time to conduct fact discovery.
9	In addition, during discovery, plaintiff has ascertained the names of percipient witnesses,
10	all employees or former employees of the defendant County of Santa Clara. An enlargement of
11	the deadline to complete discovery will allow the parties to select deposition dates convenient to
12	counsel and the witnesses.
13	Lastly, this matter is scheduled for a settlement conference before Magistrate Nathanael
14	Cousins on December 8, 2015. The parties would like to reserve the possibility to conduct
15	discovery after the settlement conference, and thereby conserve resources in the event the matter
16	settles in December.
17	ALL PREVIOUS TIME MODIFICATIONS
18	There have been no time modifications in this case to date.
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	STIPULATION TO EXTEND DISCOVERY DEADLINE; [PROPOSED] ORDER; Case No.: 15-cv-02502 RMW (NC)

1	EFFECT OF REQUESTED TIME MODIFICATION	
2	This request would have no effect on other deadlines previously set by the Court.	
3	IT IS SO STIPULATED.	
4		
5	DATED: October 19, 2015 McMANIS FAULKNER	
6		
7	/s/ JAMES McMANIS	
8	Attorneys for Plaintiff	
9		
10	DATED: October 19, 2015	
11	<u>/s/</u>	
12	DAVID ROLLO Attorneys for Defendants	
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15	PURSUANT TO STIPULATION, IT IS SO ORDERED.	
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17	DATED: 10/22/2015 <i>Ronald M. Whyte</i> United States District Judge	
18	United States District Judge	
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