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6 Attorneys for CITY OF SAN JOSE

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 8 UNITED STATES DISTRICT COURT  
 9 NORTHERN DISTRICT OF CALIFORNIA  
 10 SAN JOSE DIVISION

12 DANG, HOANG, Individually and as  
 13 Successor in Interest of TRACEY LIEN  
 TRAN, deceased ,  
 14 Plaintiff(s),  
 15 v.  
 16 CITY OF SAN JOSE, and DOES, inclusive,  
 17 Defendant(s).  
 18

Case Number: 15-CV-03177-NC  
**STIPULATION AND ORDER  
 EXTENDING TIME FOR DEFENDANT  
 TO RESPOND TO COMPLAINT AND  
 CONTINUE CASE MANAGEMENT  
 CONFERENCE [Civil L.R. 6-1(a).]**

21 As authorized by Northern District Local Rule 6-1(a), the parties herewith stipulate  
 22 to extend the time for Defendant CITY OF SAN JOSE to respond to the complaint until  
 23 and including December 3, 2015.

24 The parties also jointly request that the Case Management Conference, currently  
 25 set for December 9, 2015 at 10:00 a.m., and the court deadlines in this matter, including  
 26 the Rule 26 disclosures, be continued for a period of approximately sixty days. Defendant  
 27 City of San Jose was recently served with the subject Complaint and has not yet received  
 28 the entire file from the Police Department. The remainder of the file, which includes audio

1 and video recordings, photographs, reports and other crucial documents, is necessary in  
2 order to make Defendants' initial disclosures and respond appropriately to the Complaint.

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7 Respectfully submitted,

8 Dated: November 3, 2015

RICHARD DOYLE, City Attorney

9 By: /s/ Clifford Greenberg  
10 CLIFFORD GREENBERG  
11 Senior Deputy City Attorney

12 Attorneys for Defendant

13 Dated: November 3, 2015

LAW OFFICES OF DALE K. GALIPO

14 By: /s/ Dale Galipo  
15 DALE GALIPO

16 Attorneys for Plaintiff Dang Hoang

17  
18 I attest that Plaintiffs' counsel has read and approved this document, and given  
19 consent to the filing of the same with the Court.

20 Dated: November 3, 2015

RICHARD DOYLE, City Attorney

21 By: /s/ Clifford Greenberg  
22 CLIFFORD GREENBERG  
23 Senior Deputy City Attorney

24 Attorneys for Defendant

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**ORDER**

It is hereby Ordered that the deadline for Defendant's Response to the Complaint in this matter is extended until December 3, 2015.

It is also Ordered that the Initial Case Management Conference is continued until February 10, 2016, at 10:00 a.m. Case management statement due February 3, 2015.

Initial Disclosures shall be served on or before January 14, 2016.

DATED: November 9, 2015

