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9 Attorneys for Plaintiff

10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12 (San Jose Division)

13 JULIAN VASQUEZ-BERNABE,  
14 Plaintiff,  
15 vs.  
16 COUNTY OF SANTA CLARA, et al.  
17 Defendants.

Case No. 16-CV-03218-EJD (NC)

STIPULATION AND [PROPOSED] ORDER  
TO EXTEND DEADLINE TO FILE  
DISCOVERY MOTIONS AND EXCHANGE  
EXPERT REPORTS

18  
19 The parties to the above-entitled action have met and conferred regarding discovery and  
20 jointly request that the deadline to initiate discovery disputes with the court be extended to  
21 August 31, 2017. The parties are hopeful that all disputes can be resolved without involvement  
22 of the court, and more time is needed for County to gather and review the voluminous responsive  
23 documents. Among many other items, it has come to the parties' attention that there are  
24 thousands of pages of inmate grievance forms which have not been reviewed or produced, and it  
25 will require significant time and effort to review the documents to determine whether any of  
26 them are responsive records.

27 The parties are *not* requesting an extension for fact discovery cutoff. Plaintiff remains  
28 concerned that if and when documents are produced related to the current disputes, there may in



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JAMES R. WILLIAMS  
County Counsel

Dated: July 27, 2017

By: \_\_\_\_\_  
/s/  
MELISSA R. KINIYALOCTS  
Deputy County Counsel

Attorneys for Defendants  
COUNTY OF SANTA CLARA and  
SERGEANT ANDREW AGUILAR

DAVIS & YOUNG

Dated: July 27, 2017

By: \_\_\_\_\_  
/s/  
STEVEN B. DIPPELL

Attorneys for Defendant  
CORRECTIONAL DEPUTY  
EDDIE BARRERA

McDOWALL COTTER, APC

Dated: July 27, 2017

By: \_\_\_\_\_  
/s/  
DAVID S. ROSENBAUM

Attorneys for Defendant  
CORRECTIONAL DEPUTY  
EMMANUEL THOMAS

1 **[PROPOSED] ORDER**

2 The deadlines and hearing date contained in the court's Pretrial Order (Doc 46) for the  
3 items noted below are extended as follows:

4 August 31, 2017: Deadline to File Fact Discovery Motions

5 September 7, 2017: Deadline to Designate Opening Experts w/ Reports

6 September 27, 2017: Deadline to Designate Rebuttal Experts w/ Reports

7 October 18, 2017: Expert Discovery Cutoff

8 October 25, 2017: Deadline to File Expert Discovery Motion

9 November 1, 2017: Deadline to File Dispositive Motions

10 January 18, 2018 at 9:00 a.m.: Hearing on Dispositive Motions

11  
12 PURSUANT TO STIPULATION, IT IS SO ORDERED.

13  
14 Dated: July 28, 2017



15 EDWARD J. DAVILA  
16 United States District Judge