

1 WHEREAS, Plaintiff intends to take the deposition of Sacramento Police Officer Brandon
2 Kellerman but have been informed by Defendants' Counsel that Officer Kellerman is currently out
3 on medical leave and thus unable to be deposed before the close of fact discovery.

4 WHEREAS, the Parties have agreed that the most prudent course of action is to take Officer
5 Kellerman's deposition once Officer Kellerman has returned from medical leave.

6 WHEREAS, the Parties intend to take all other non-expert depositions in this matter before
7 the close of fact discovery.

8 WHEREAS, the Parties hereby STIPULATE TO and JOINTLY REQUEST that Plaintiff
9 be permitted to take Officer Kellerman's deposition after the close of fact discovery, but before
10 October 1, 2024, or when Defendants file a dispositive motion, whichever comes first.

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12 IT IS SO AGREED.

13 Dated: April 3, 2023

14 /s/ TY CLARKE

15 TY CLARKE

16 Attorney for Plaintiff

17 Dated: April 3, 2023

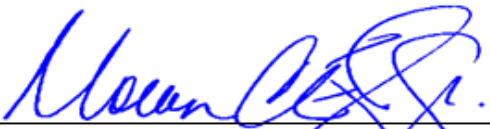
18 /s/ Ricardo Baca

19 Ricardo Baca

20 Attorney for Defendants

21
22 IT IS SO ORDERED.

23 Dated: April 5, 2023

24 
25 MORRISON C. ENGLAND, JR.
SENIOR UNITED STATES DISTRICT JUDGE