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UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

G. I. S. E. by and through his guardian ad litem, EDDIE SANCHEZ, Plaintiff, vs. CITY OF CHICO, CHICO POLICE DEPARTMENT, MARK BASS, DAVID BAILEY, and DOES 1-50, Defendants.	Case No.: 2:22-cv-01654-JDP JOINT STIPULATION TO MODIFY THE SCHEDULING ORDER AND ~~[PROPOSED]~~ ORDER

ALVAREZ-GLASMAN & COLVIN ATTORNEYS AT LAW

AUTHENTICATED U.S. GOVERNMENT INFORMATION GPO

Plaintiff G.I.S.E., by and through his guardian ad litem, EDDIE SANCHEZ, and Defendants CITY OF CHICO, CHICO POLICE DEPARTMENT, MARK BASS, and DAVID BAILEY (the "Chico Defendants"), by and through their respective counsel of record in the above-captioned litigation, hereby present this Stipulation to Modify the Scheduling Order only with regard the to the Discovery Cut-off deadline based upon the following good cause:

TO THE HONORABLE COURT AND TO ALL PARTIES AND COUNSEL:

The parties have worked diligently to schedule depositions and conduct discovery. The parties have several depositions scheduled to take place before the end of October 2025. Discovery cut-off is currently scheduled for October 31, 2025.

There are still numerous party, and non-party and expert witnesses who will need to have their depositions taken in this action. The current deadline of October 31, 2025, for discovery will not afford enough time for the parties to complete this phase of discovery.

The parties are not requesting the Court to modify the operative dates and deadlines for the Final pretrial conference and Jury Trial. This stipulation is the parties third request for any continuance in this action.

STIPULATION TO MODIFY THE SCHEDULING ORDER

Accordingly, in light of the foregoing Good Cause, the parties hereby stipulate to and jointly request that the Court enter an order to modify the scheduling order, as follows:

1. The parties respectfully request an order continuing the expert and non-expert Discovery cut-off date from October 31, 2025, to November 28, 2025.

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2. Except as specified herein above, all other operative dates and deadlines within the Court's Scheduling Orders would remain unchanged and unaffected by the parties' Stipulation or any associated Order made pursuant thereto.

IT IS SO STIPULATED.

Respectfully submitted,

Dated: October 14, 2025

ALVAREZ-GLASMAN & COLVIN
JOHN W. LAM
CITY ATTORNEY

/S/ Roger A. Colvin
Roger A. Colvin
Attorneys for Defendants,
City of Chico, Mark Bass, and
Officer David Bailey

Dated: October 14, 2025

LAW OFFICE OF FULVIO F. CAJINA

By: /s/ Fulvio Cajina
FULVIO CAJINA
Attorney for Plaintiff, G.I.S.E.

Dated: October 14, 2025

LAW OFFICE OF STANLEY GOFF

/S/ Stanley Goff
Stanley Goff
Attorney for Plaintiff, G.I.S.E.

ALVAREZ-GLASMAN & COLVIN ATTORNEYS AT LAW

~~[PROPOSED]~~ ORDER

Pursuant to the Joint Stipulation of the parties and Good Cause appearing therefor, IT IS HEREBY ORDERED: The operative case management scheduling order is hereby modified, as follows:

1. The expert and non-expert Discovery Cut-off is continued from October 31, 2025, to November 28, 2025.

2. All other operative dates and deadlines remain unchanged.

IT IS SO ORDERED.

Dated: October 16, 2025

JEREMY D. PETERSON
UNITED STATES MAGISTRATE JUDGE

ALVAREZ-GLASMAN & COLVIN
ATTORNEYS AT LAW