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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 **STIPULATION TO CONTINUE SCHEDULING DEADLINES AND ORDER**

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AUTHENTICATED U.S. GOVERNMENT INFORMATION GPO

STIPULATION

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 stipulate and request that the Court enter an order to continue certain case management deadlines.

WHEREAS, the parties were expecting to complete discovery in October 2024 by, among other things, completing the depositions of certain percipient witnesses in Chico, California;

WHEREAS, counsel for the Chico Defendants is scheduled to commence trial in the United States District Court for the Eastern District of California on October 7, 2024, in the case of the *Estate of Tyler S. Rushing, et al. v. AG Private Protection, Inc., et al.* (U.S.D.C. Case No. 2:18-cv-01692-DAD-AC);

WHEREAS, counsel for the Chico Defendants does not have sufficient time to complete discovery in this matter by the current deadline of October 11, 2024, due to that federal trial; and

WHEREAS, counsel for both sides believe it makes sense to postpone discovery cutoff and related pre-trial dates in this matter due to defense counsel's trial schedule.

NOW, THEREFORE, the parties respectfully request this Court extend the deadlines in this matter as follows:

Event	**Current Deadline**	**Proposed Deadline**
Discovery Cutoff	October 11, 2024	December 20, 2024
Motion to Compel Discovery Deadline	November 15, 2024	January 24, 2025
Last day to hear dispositive motion	December 18, 2024	February 28, 2025

Good cause exists for continuance of deadlines reflected above as required pursuant to Federal Rule of Civil Procedure Rule 16(b)(4) due to defense counsel's trial schedule, which has significantly impacted the parties' ability to complete discovery.

This is the parties' fourth request for continuance of case management deadlines. The parties do not currently foresee the need for a further continuance in the future.

IT IS SO STIPULATED.

Dated: September 20, 2024

LAW OFFICE OF FULVIO F. CAJINA

By: */s/ Fulvio Cajina*
FULVIO F. CAJINA
Attorneys for Plaintiff
G.I.S.E.

Dated: September 20, 2024

ALVAREZ-GLASMAN & COLVIN

By: Sharon Medellín
Sharon Medellín
Attorneys for Defendants
CITY OF CHICO, et al.

~~PROPOSED~~ ORDER

GOOD CAUSE APPEARING, the parties' stipulation is GRANTED, as modified below. The following deadlines are CONTINUED and RESET as follows:

Event	Current Deadline	Proposed Deadline
Discovery Cutoff	October 11, 2024	December 20, 2024
Motion to Compel Discovery Deadline	November 15, 2024	January 23, 2025
Last day to hear dispositive motion	December 18, 2024	February 27, 2025

IT IS SO ORDERED.

Dated: September 24, 2024

JEREMY D. PETERSON
UNITED STATES MAGISTRATE JUDGE