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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 STAY ALL PROCEEDINGS AND COURT DEADLINES

AUTHENTICATED U.S. GOVERNMENT INFORMATION GPO

The above-captioned Plaintiff(s) and Defendant(s) (hereafter, the "Parties"), by and through their respective counsel, hereby stipulate and request as follows:

WHEREAS, Plaintiff's Counsel, Stanley Goff, suffered a life-threatening incident on November 29, 2024;

WHEREAS, Mr. Goff was admitted to the intensive care unit (the "ICU") at Zuckerberg General Hospital on that day;

WHEREAS, Mr. Goff remains at the ICU and is currently receiving critical medical care due;

WHEREAS, Mr. Goff will need to undergo an extensive recovery period following said care;

WHEREAS, at the time of the above incident, the parties were still in the process of completing discovery; and

WHEREAS, said unforeseen circumstance constitutes good cause to stay all pending proceedings and deadlines in the above-captioned for a period of three (3) months.

NOW, THEREFORE, the Parties hereby stipulate, agree, and respectfully request that:

1. The Court stay the litigation, including all proceedings and deadlines, in all respects, for the next ninety (90) days in the above-captioned matter; and
2. That the Court set a Case Management Conference in early April 2025, per the availability of the Court, for a status update on this matter and to reset deadlines.
3. The Parties will also agree to provide the Court an updated joint case management conference statement seven (7) days in advance of said Case Management Conference with a status update and a proposed scheduling order for any deadlines impacted by this stay.

IT IS SO STIPULATED.

Respectfully submitted,

Dated: December 9, 2024

LAW OFFICE OF FULVIO F. CAJINA

By: */s/ Fulvio Cajina*
FULVIO CAJINA
Attorney for Plaintiff

Dated: December 9, 2024

ALVAREZ-GLASMAN & COLVIN

By: Sharon Medellín
Sharon Medellín
Attorneys for Defendants,
City of Chico, Mark Bass, and
David Bailey

~~[PROPOSED]~~ ORDER

PURSUANT TO STIPULATION, IT IS ORDERED:

1. Finding good cause, this matter is stayed, including all proceedings and upcoming deadlines, in all respects, until March 20, 2025 absent further order by the court; and
2. A Case Management Conference is set for April 10, 2025. The Parties are ordered to file a joint case management statement seven (7) days prior to the Case Management Conference wherein the Parties will provide the Court an update and propose an amended scheduling order for any deadlines impacted by this stay.

IT IS SO ORDERED.

Dated: December 20, 2024

JEREMY D. PETERSON
UNITED STATES MAGISTRATE JUDGE