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Attorneys for Defendants CITY OF VALLEJO,
DYNELLE JONES, CLINTON HILL, BRAD KIM,
ROSENDO MESA, CONNOR SULLIVAN, DANIEL
SARAVIA, MARK THOMPSON, JAMES BEGLIN,
RASHAD HOLLIS, and JASON TA

UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF CALIFORNIA

SHEILA MCCORMICK, individually and as
a successor-in-interest to Decedent DAVID
BENJAMIN; and SALVADOR GARCIA,
individually and as a successor-in-interest to
Decedent DAVID BENJAMIN,

Plaintiffs,

vs.

CITY OF VALLEJO, a municipal
corporation; OFFICER DYNELLE JONES,
individually and in her official capacity as a
police officer for the City of Vallejo;
OFFICER CLINTON HILL, individually
and in his official capacity as a police officer
for the City of Vallejo; OFFICER BRAD
KIM, individually and in his official capacity
as a police officer for the City of Vallejo;
OFFICER ROSENDO MESA, individually
and in his official capacity as a police officer
for the City of Vallejo; OFFICER CONNOR
SULLIVAN, individually and in his official
capacity as a police officer for the City of
Vallejo; OFFICER DANIEL SARAVIA,

Case No. 2:25-cv-01468-JDP

**STIPULATION AND ~~{PROPOSED}~~
ORDER REGARDING FRCP 26
CONFERENCE, DISCLOSURES, AND
DISCOVERY PLAN [LR 143]**

1 individually and in his official capacity as a
2 police officer for the City of Vallejo;
3 OFFICER MARK THOMPSON,
4 individually and in his official capacity as a
5 police officer for the City of Vallejo;
6 OFFICER JAMES BEGLIN, individually
7 and in his official capacity as a police officer
8 for the City of Vallejo; LIEUTENANT
9 HERMAN ROBINSON, in his official
10 capacity as a police lieutenant for the City of
11 Vallejo; SERGEANT RASHAD HOLLIS, in
his official capacity as a police sergeant for
the City of Vallejo; CHIEF JASON TA, in
his official capacity as the Chief of Police for
the City of Vallejo; Solano County Sheriff's
Coroner's Office; and DOES 1 - 50,
inclusive, individually jointly, and severally,

12 Defendants.

13
14 **WHEREAS**, Plaintiffs initiated the instant action by filing a Complaint for Damages on
15 May 27, 2025;

16 **WHEREAS**, on August 13, 2025 Plaintiffs' counsel filed a Motion to Withdraw, which
17 was unopposed and has been taken under submission;

18 **WHEREAS**, on September 23, 2025, counsel for Defendants City of Vallejo, Dynelle
19 Jones, Clinton Hill, Brad Kim, Rosendo Mesa, Connor Sullivan, Daniel Saravia, Mark Thompson,
20 James Beglin, Rashad Hollis, and Jason Ta filed a Motion to Dismiss;

21 **WHEREAS**, on September 23, 2025, counsel for Defendant Herman Robinson filed a
22 Motion to Dismiss;

23 **WHEREAS**, Defendants' respective Motions to Dismiss are set for hearing November 20,
24 2025;

25 **WHEREAS**, on October 15, 2025 all counsel met and conferred by phone pursuant to
26 Federal Rule of Civil Procedure 26(f);

27 **WHEREAS**, all counsel agrees it would be most efficient and appropriate to exchange
28 initial disclosures and develop a proposed discovery plan after resolution of Plaintiffs' counsel's

1 pending Motion to Withdraw and Defendants' pending Motions to Dismiss.

2 **NOW THEREFORE**, the parties stipulate to and request an order directing that the parties
3 confer pursuant to Federal Rule of Civil Procedure 26(f) within 30 days following resolution of
4 Plaintiffs' counsel's Motion to Withdraw and filing of an Answer by all Defendants.

5 **SO STIPULATED.**

6 DATED: October 15, 2025

7 /s/ Katherine MacElhiney (as authorized on
8 October 15, 2025)
9 KATHERINE MACELHINEY
10 Attorney for Plaintiffs SHEILA
11 MCCORMICK and SALVADOR GARCIA,
12 individually and as successors in interest to
13 Decedent DAVID BENJAMIN

14 DATED: October 15, 2025

15 /s/ Derick Konz (as authorized on October 15,
16 2025)
17 DERICK KONZ
18 Attorney for Defendant HERMAN
19 ROBINSON

20 DATED: October 16, 2025

21 /s/ Katelyn M. Knight
22 KATELYN M. KNIGHT
23 Assistant City Attorney
24 Attorney for Defendants
25 CITY OF VALLEJO, DYNELLE JONES,
26 CLINTON HILL, BRAD KIM, ROSENDO
27 MESA, CONNOR SULLIVAN, DANIEL
28 SARAVIA, MARK THOMPSON, JAMES
BEGLIN, RASHAD HOLLIS, and JASON TA

IT IS SO ORDERED.

Dated: October 16, 2025


JEREMY D. PETERSON
UNITED STATES MAGISTRATE JUDGE