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UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF CALIFORNIA

CIRILO HERNANDEZ, an individual; Plaintiff, v. COUNTY OF SACRAMENTO, a municipal corporation; and DOES 1-50, inclusive. Defendants.	Case: 2:25-cv-02276-DJC-CSK **STIPULATION AND ORDER TO GRANT PLAINTIFF LEAVE TO FILE SECOND AMENDED COMPLAINT**

IT IS HEREBY STIPULATED, and respectfully requested, by and between Plaintiff and Defendants (hereinafter, "the Parties") by and through their designated counsel, that:

WHEREAS, on July 24, 2026, Plaintiff filed the First Amended Complaint. (ECF No. 27).

WHEREAS, since the filing of Plaintiff's First Amended Complaint, the Defendant County of Sacramento has provided additional discovery materials, including body-worn

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camera recordings. Following the review of this discovery, Plaintiff has discovered the identity of a sergeant—Sacramento County Sheriff's Office Sergeant Joseph McMahon—who was previously identified in the First Amended Complaint as a Doe Defendant.

WHEREAS, Plaintiff has drafted a proposed Second Amended Complaint naming Sergeant McMahon as a Defendant. Plaintiff has provided the redlined proposed Second Amended Complaint to the Defendants' Counsel. Plaintiff has also attached the redlined proposed Second Amended Complaint as an exhibit to this stipulation and proposed order.

WHEREAS, the Parties STIPULATE TO and JOINTLY REQUEST that this Court grant Plaintiff leave to file the proposed Second Amended Complaint in this matter.

IT IS SO AGREED.

Dated: **August 20, 2026**

/s/ **Ty Clarke**
Ty Clarke
Attorney for Plaintiffs

Dated: **August 20, 2026**

/s/ **Ashley Calvillo**
Ashley Calvillo
Attorney for Defendant County

IT IS SO ORDERED.

Dated: August 21, 2026

/s/ Daniel J. Calabretta
THE HONORABLE DANIEL J. CALABRETTA
UNITED STATES DISTRICT JUDGE

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