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10 *Attorneys for Plaintiffs*

11  
12 **IN THE UNITED STATES DISTRICT COURT**  
13  
14 **IN AND FOR THE DISTRICT OF ARIZONA**

15 Johnny Wheatcroft and Anya Chapman, as  
16 husband and wife, and on behalf of minors J.  
17 W. and B. W.,

18 Plaintiffs,

19 v.

20 City of Glendale, a municipal entity; Matt  
21 Schneider, in his official and individual  
22 capacities; Mark Lindsey, in his official and  
23 individual capacities; and Michael Fernandez,  
24 in his official and individual capacities;

25 Defendants.

Case No.: 2:18-cv-02347-SMB

26  
**STIPULATION TO EXTEND TIME  
TO SERVE THE MANDATORY  
INITIAL DISCOVERY PILOT  
PROJECT RESPONSES**

27 The Parties, by and through undersigned counsel, hereby stipulate and agree to extend the  
28 time to serve their responses to the Mandatory Initial Discovery Pilot Project from December  
29 26, 2018, to January 4, 2019 and ask this Court to enter an Order adopting the new deadline.

30 The Parties are actively gathering information responsive to the Mandatory Initial  
31 Discovery Pilot Project but need additional time to confer with their respective clients regarding  
32 the information contained therein. However, the holidays have made impeded communication  
33 to finalize the Mandatory Initial Discovery Responses. The Parties believe it is necessary to  
34 provide the most accurate information available to them, as such information will lead to much

1 more fruitful and valuable responses. This stipulation is made for good cause and not for delay.

2 Therefore, the Parties respectfully request this Court to enter an Order extending the time  
3 to serve the Mandatory Initial Discovery Responses from December 26, 2018 to January 4,  
4 2019.

5 RESPECTFULLY SUBMITTED this 26th day of December, 2018.

6 ATTORNEYS FOR FREEDOM

7 By: /s/ Jody L. Broaddus

8 Jody L. Broaddus, Esq.

9 Marc J. Victor, Esq.

10 *Attorneys for Plaintiffs*

11 JONES, SKELTON & HOCHULI, P.L.C

12 By: /s/ Joseph J. Popolizio (with permission)

13 Joseph J. Popolizio

14 Justin M. Ackerman

15 40 North Central Avenue, Suite 2700

16 Phoenix, Arizona 85004

17 *Attorneys for Defendants*

18 **CERTIFICATE OF SERVICE**

19 I hereby certify that on this date, I electronically transmitted the foregoing to the Clerk's  
20 office using the CM/ECF system for filing and transmittal of a Notice of Electronic filing to the  
21 following registrants, and a copy was also sent by first class mail to:

22 Joseph J. Popolizio

23 Justin M. Ackerman

24 JONES, SKELTON & HOCHULI, P.L.C.

25 40 North Central Avenue, Suite 2700

26 Phoenix, Arizona 85004

By: /s/ Alexandria Thompson