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Attorney for Plaintiffs

**IN THE UNITED STATES DISTRICT COURT
IN AND FOR THE EASTERN DISTRICT OF CALIFORNIA
FRESNO DIVISION**

TERRY HILLBLOM, SANDRA HILLBLOM,) No. 1:07-cv-01467-LJO-SMS
and MICHAEL L., a minor, by and)
and through his guardians ad litem, TERRY)
and SANDRA HILLBLOM,)
)
Plaintiffs,) **STIPULATION AND**
) **ORDER**
v.)
)
MOTION FOR PROTECTIVE)
)
COUNTY OF FRESNO; former FRESNO)
COUNTY SHERIFF RICHARD PIERCE;)
FRESNO COUNTY DEPUTY SHERIFF) DATE: JULY 20, 2010
ROBERT CAREY; FRESNO COUNTY) TIME: 2:30 p.m.
SHERIFF'S SERGEANTS KATHY)
)
DEPT: 7)
CARREIRO and E. BROUGHTON; and)
DOES 1 through 50.)
)
)
Defendants.)

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The parties hereby stipulate to and request an Order on Defendants’ Motion for a Protective Order, as follows:

Plaintiffs will take the following depositions:

1. Lt. Mark Padilla, as defendants’ PMK regarding Fresno County Sheriff’s Department supervisory practices, internal affairs investigations and management systems.
2. Lt. Richard Ko, as defendants’ PMK regarding Fresno County Sheriff’s Department training and certification.
3. Hanford Police Chief Carlos Mestas, as a percipient witness and as defendants’ PMK regarding Fresno County Sheriff’s Department background investigations and hiring.
4. Rod Craig
5. Sgt. Greg Gularte
6. Richard Pierce
7. Kathy Carreiro
8. Eric Broughton
9. Robert Carey

Plaintiffs agree to request but not require document production in their notices for these depositions.

The parties agree, and request an Order permitting, extension of the non-expert witness discovery cutoff date through and until September 5, 2010, in light of travel plans and medical issues related to two witnesses, which may not permit the taking of their

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depositions until early September. The parties do not request a change in the existing trial, pretrial and dispositive motions dates as set forth in the current Scheduling Order.

IT IS SO STIPULATED.

Dated: July 23, 2010
/s/ Patience Milrod

PATIENCE MILROD
Attorney for Plaintiffs

Dated: July 23, 2010
/s/ James J. Arendt

JAMES J. ARENDT
Attorney for Defendants

ORDER ON STIPULATION

Having reviewed the Defendants' moving papers, and the parties' discovery dispute summaries, and having conducted a telephonic hearing on July 20, 2010 at 2:30 p.m. at which defense and plaintiffs' counsel presented their positions and arguments, and finding the parties have been reasonably diligent in their efforts to complete discovery, and other good cause appearing therefor,

IT IS HEREBY ORDERED that the non-expert discovery cutoff date be and is hereby extended to September 5, 2010, and that the existing trial, pretrial and dispositive motions dates as set forth in the current Scheduling Order remain FIRM.

IT IS FURTHER ORDERED that plaintiffs may take the following depositions:

1. Lt. Mark Padilla, as defendants' PMK regarding Fresno County Sheriff's Department supervisory practices, internal affairs investigations and management systems.
2. Lt. Richard Ko, as defendants' PMK regarding Fresno County Sheriff's Department training and certification.
3. Hanford Police Chief Carlos Mestas, as a percipient witness and as

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defendants' PMK regarding Fresno County Sheriff's Department background investigations and hiring.

4. Rod Craig
5. Sgt. Greg Gularte
6. Richard Pierce
7. Kathy Carreiro
8. Eric Broughton
9. Robert Carey

IT IS FURTHER ORDERED that plaintiffs may request but not require production of documents in connection with these depositions.

IT IS SO ORDERED.

Dated: August 2, 2010

/s/ Sandra M. Snyder
UNITED STATES MAGISTRATE JUDGE