

1 BINGHAM MCCUTCHEN LLP  
WARREN E. GEORGE (SBN 53588)  
2 MANU PRADHAN (SBN 253026)  
Three Embarcadero Center  
3 San Francisco, CA 94111-4067  
Telephone: 415.393.2000  
4 Facsimile: 415.393.2286  
Email: warren.george@bingham.com  
5 manu.pradhan@bingham.com

6 EDWARD A. ANDREWS (SBN 268479)  
The Water Garden  
7 Fourth Floor, North Tower  
1620 26th Street  
8 Santa Monica, CA 90404-4060  
Telephone: 310.907.1000  
9 Facsimile: 310.907.2000  
Email: edward.andrews@bingham.com

10 COURTNEY E. SMITH (SBN 273598)  
11 1117 S. California Avenue  
Palo Alto, CA 94304  
12 Telephone: 650.849.4400  
Facsimile: 650.849.4800  
13 Email: courtney.smith@bingham.com

14 Attorneys for Plaintiffs Maria del Rosario  
Corona and Andres Santana

15 UNITED STATES DISTRICT COURT  
16 EASTERN DISTRICT OF CALIFORNIA  
17

18 MARIA DEL ROSARIO CORONA, AS HEIR  
19 OF THE ESTATE OF OSCAR CRUZ, et. al.,

20 Plaintiffs,

21 v.

22 MARTIN BITER, et al.,

23 Defendants.  
24  
25  
26

Case No. 1:08-CV-00237-LJO-DLB

**STIPULATION REGARDING  
EXPERT DISCLOSURES; ORDER**

Case No. 1:08-CV-00237-LJO-DLB

STIPULATION REGARDING EXPERT DISCLOSURES

1 **STIPULATION**

2 Pursuant to Fed. R. Civ. Proc. 26(a)(2), the parties stipulate to an extension of the  
3 deadline regarding expert disclosures. Disclosures are due on July 17, 2012. (Dkt. No. 129.)  
4 This deadline was previously extended because of the need to extend fact discovery. (*Id.*)

5 A short extension of time is necessary for the disclosures for a correctional expert  
6 Plaintiffs intend to call at trial. The correctional expert has recently experienced a death in the  
7 family. Since then, Plaintiffs’ contact with the expert has been extremely limited, and Plaintiffs  
8 do not currently know the expert’s availability, or whether he is able to devote sufficient time to  
9 the disclosures before they are due on the 17th. At the same time, Plaintiffs’ opposition to  
10 Defendants’ summary judgment motion is due August 3, 2012. (Dkt. No. 151.) So as not to  
11 interfere with that calendar item, and to minimize prejudice to Defendants, Plaintiffs request that  
12 the disclosure deadline for their correctional expert be extended until August 3. Plaintiffs  
13 believe their expert should be able to complete disclosures by August 3.

14 Therefore, the parties stipulate that the disclosures for Plaintiffs’ correctional expert will  
15 be due on August 3. This stipulation does not affect the disclosure date for any other experts  
16 subject to a disclosure obligation.

17 Date: July 13, 2012

BINGHAM MCCUTCHEN LLP

18  
19 By: \_\_\_\_\_ /s/  
20 Manu Pradhan  
Attorneys for Plaintiffs

21 Date: July 13, 2012

ATTORNEY GENERAL OF THE STATE OF  
22 CALIFORNIA

23  
24 By: \_\_\_\_\_ /s/  
25 Kelli M. Hammond  
Attorney for Defendants

**ORDER**

GOOD CAUSE showing, IT IS SO ORDERED that the parties' stipulation regarding expert disclosures is approved. The disclosures for Plaintiffs' correctional expert shall occur on or before August 3, 2012. All other disclosures shall occur on or before July 17, 2012, consistent with this Court's prior order (Dkt. No. 129).

DATE: \_\_\_\_\_, 2012

By: \_\_\_\_\_  
Judge, United States District Court for the  
Eastern District of California

