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UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

MIGUEL GONZALEZ, JR., a minor by
and through his guardian ad litem,
Maria Gonzalez, *et al.*,

Plaintiffs,

v.

UNITED STATES OF AMERICA,
GURVIR KHURANA, M.D.; KERN
MEDICAL CENTER; *and* DOES 1
through 300, inclusive

Defendants.

CASE NO.:1:09-cv-00509 LJO-SKO

**STIPULATION AND ORDER TO
EXTEND DEFENDANTS' EXPERT
DESIGNATION DEADLINE AND
REBUTTAL DESIGNATION
DEADLINE**

COMES NOW THE PARTIES by and through their respective attorneys and
subject to the approval of this Court, hereby agree to and respectfully request the
below modifications and/or amendments to this Court's Amended Status (Pretrial
Scheduling) Order. Docket Entry ("DE") 43. The parties submit that this request is
made for good cause and not for delay.

1. Defendants' deadline to designate expert witnesses is moved from March
29, 2011 to April 4, 2011; and

STIPULATION TO EXTEND DEFENDANTS' EXPERT DESIGNATION

2. The parties' deadline to designate supplemental experts is moved from
May 2, 2011 to May 6, 2011.

IT IS SO STIPULATED.

Respectfully submitted,

BENJAMIN B. WAGNER
United States Attorney

Dated: March 18, 2011

By: /s/ Jason Ehrlinspiel
JASON EHRLINSPIEL
Assistant U.S. Attorney
Attorneys for Defendant

Dated: March 18, 2011

DONAHUE & HORROW, LLP

By: /s/ Nicole D. Podgurski
THOMAS E. DONAHUE
NICHOLE D. PODGURSKI
Attorneys for Plaintiffs

LeBEAU-THELEN, LLP

Dated: March 18, 2011

By: /s/ Kevin E. Thelen
KEVIN E. THELEN

Attorneys for Defendant
Gurvur Khurana, M.D.

Office of the County Counsel, County of Kern

Dated: March 18, 2011

By: /s/ Jennifer Esquivel Zahry
JENNIFER ESQUIVEL ZAHRY

Attorneys for Defendant
Kern Medical Center

IT IS SO ORDERED.

Dated: March 21, 2011

/s/ Sheila K. Oberto
UNITED STATES MAGISTRATE JUDGE