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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 DESIGNATIONS**

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  
Gurvir 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