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6 COUNTY OF MADERA and
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8 UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA

10 KAREN MITCHELL and TONI LINDSEY,

11 Plaintiffs,

12 v.

13 COUNTY OF MADERA and MICHAEL
14 KEITZ,

15 Defendants.

Case No. 1:10-cv-01405-LJO-DLB

**STIPULATION RE LIMITED
EXTENSION OF NON-EXPERT
DISCOVERY**

1 IT IS HEREBY STIPULATED by and between the above-entitled parties through their
2 respective attorneys of record that:

3 1. The Scheduling Order in the above-entitled matter dated December 2, 2010, set
4 forth that all discovery pertaining to non-experts was to be completed on or before July 1, 2011.
5 Notwithstanding the parties' diligent efforts to complete the depositions of all non-expert
6 witnesses in advance of the scheduled deadline, unanticipated schedule conflicts, vacations, and
7 health issues have necessitated rescheduling of the following depositions to dates beyond the
8 July 1, 2011 deadline.

9 2. Depositions to be taken outside the non-expert discovery deadline should be
10 limited to the following:

- 11 • Karen Mitchell
- 12 • Ernie LiCalsi
- 13 • Kathy Taylor
- 14 • Michael Keitz
- 15 • Depositions of those individuals designated as Persons Most
16 Knowledgeable in response to two deposition notices served by Plaintiffs
17 on June 21, 2011

18 3. No other non-expert discovery will be taken past July 1, 2011. Should the
19 depositions of the above-listed individuals cause the need for discovery-related motions, the
20 August 1, 2011 deadline for filing such motions, and the August 26, 2011 deadline for hearing
21 discovery motions related to these four witnesses shall be extended to September 1, 2011 for
22 filing and September 23, 2011 for hearing.

23 4. Nothing about the continued deposition dates herein stipulated to by the parties
24 shall affect the ability of the parties to proceed with the currently scheduled Pretrial Conference
25 on November 30, 2011 or the scheduled trial date of January 17, 2012.

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{DMC/00016477.}

STIP RE LTD EXT OF NON-EXPERT DISCOVERY

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IT IS SO STIPULATED.

Dated: June 23, 2011

COTA COLE LLP

By: /s/ Dennis M. Cota

Dennis M. Cota
Carolyn J. Frank
James D. Maynard
Attorneys for Defendants
COUNTY OF MADERA and MICHAEL
KEITZ

Dated: June 23, 2011

PENNER, BRADLEY & SIMONIAN

By: /s/ Peter S. Bradley

Peter S. Bradley
Attorneys for Plaintiffs
KAREN MITCHELL and TONI
LINDSEY

ORDER

Based on the Stipulation set forth above, the accompanying Declaration of Dennis M. Cota, and the absence of any impact on the Pretrial Conference and trial dates in this matter, good cause exists for the limited extension of discovery agreed to by the parties, and therefore,

IT IS SO ORDERED.

Dated: June 24, 2011

/s/ Dennis L. Beck
UNITED STATES MAGISTRATE JUDGE