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7 COUNTY OF FRESNO

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9 **UNITED STATES DISTRICT COURT**  
10 **EASTERN DISTRICT OF CALIFORNIA – FRESNO DIVISION**

11 GENERAL SECURITY SERVICES  
12 CORPORATION,

13 Plaintiff,

14 v.

15 COUNTY OF FRESNO,  
16

17 Defendant.

Case No. 1:11-CV-00724 AWI MJS

**STIPULATION TO MODIFY  
SCHEDULING ORDER; ORDER  
THEREON.**

18 Plaintiff GENERAL SECURITY SERVICES CORPORATION (hereinafter  
19 “Plaintiff”) and defendant COUNTY OF FRESNO (hereinafter “Defendant”) hereby  
20 present the following Stipulation to Modify the current Scheduling Order in the above-  
21 captioned action.

22 **RECITALS**

23 WHEREAS, on September 29, 2011, the Court issued its initial Scheduling  
24 Order. In said order, the cut-off date for non-expert discovery was set for June 1, 2012.

25 WHEREAS, on January 13, 2012, Plaintiff served Interrogatories (Set No. 1),  
26 Requests for Admissions (Set No. 1), and Requests for Production of Documents on  
27 Defendant.  
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1 WHEREAS, the parties have engaged in extensive meet and confer efforts  
2 regarding the aforementioned written discovery in order to avoid the necessity of  
3 intervention by the Court,

4 WHEREAS, with regard to the Requests for Production of Documents, the  
5 parties recently agreed that Defendant would obtain and produce certain documents  
6 from the Probation Department's computer systems. Said documents are identified in  
7 the recently signed Stipulated Protective Order, dated April 20, 2012. See *Doc. No. 26*.

8 WHEREAS, Defendant has produced approximately half of the documents  
9 contemplated by the aforementioned Stipulated Protective Order. However, due to a  
10 previously planned vacation by Karen Rau, Staff Analyst for the Probation Department,  
11 the remaining documents will not be able to be identified, printed out, and produced until  
12 some time after May 14, 2012.

13 WHEREAS, the depositions of Plaintiff's representatives Whitney Miller and  
14 Steve Leopold, noticed by Defendant's counsel for May 4, 2012, will not be able to go  
15 forward due to a scheduling conflict with Plaintiff's counsel. As such, these depositions  
16 will not be able to be taken until the last week in May, 2012.

17 WHEREAS, no previous modification of the Scheduling Order has taken place.

18 **STIPULATION**

19 Now, therefore, IT IS HEREBY STIPULATED AND AGREED, by and between  
20 the parties, through their respective attorneys of record that:

21 1. The non-expert discovery cut-off date be extended from June 1, 2012 to  
22 July 6, 2012.

23 2. The expert discovery cut-off date, and the last day to file a non-dispositive  
24 motion, be extended from August 1, 2012 to August 22, 2012.

25 3. All other operative dates in the existing Scheduling Order will remain the  
26 same.

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1 **IT IS SO STIPULATED.**

2 Dated: April 27, 2012

3 KEVIN B. BRIGGS  
4 County Counsel

5 By: /s/ Michael Linden  
6 Michael R. Linden, Deputy  
7 Attorneys for Defendant

8 Dated: April 27, 2012

9 VAUGHN LEGAL GROUP

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11 By: /s/ Kelly Everett  
12 Kelly Everett  
13 Attorney for Plaintiff

14 **ORDER**

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20 IT IS SO ORDERED.

21 Dated: April 30, 2012

22 /s/ Michael J. Seng  
23 UNITED STATES MAGISTRATE JUDGE