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	Attorneys for Defendant		
6	TWAIN HARTE COMMUNITY SERVICES DISTRICT		
7	<u>PUBLIC ENTITY-FILING FEE WAIVED</u>		
8	UNITED STATES DISTRICT COURT		
9	EASTERN DISTRICT OF CALIFORNIA		
10	YVONNE HILTON ,) Case No. 1:12-CV-01360-SMS	
11 12	Plaintiff,) STIPULATION AND DECLARATION;) ORDER RE: EXPERT DISCOVERY 	
	VS.) OKDER KE. EM EKT DISCOVERT	
13)	
14	TWAIN HARTE COMMUNITY)	
1 -	SERVICES DISTRICT, and DOES ONE)	
15	THROUGH TWENTY, Inclusive,		
16	Defendants,)	
17)	
18		_)	
-0			

IT IS HEREBY STIPULATED by Plaintiff, YVONNE HILTON, by and through her attorneys, and Defendant, TWAIN HARTE COMMUNITY SERVICES DISTRICT, by and through its attorneys, that the initial expert disclosure deadline of June 20, 2014 be continued to June 27, 2014; that the rebuttal expert disclosure deadline of July 3, 2014 be continued to July 10, 2014; and that the expert discovery deadline of August 1, 2014 be continued to August 8, 2014.

The parties submit that good cause exists to continue the dates set forth above because it will allow the parties to avoid the expense of retaining experts and finalizing expert reports until

STIPULATION OF THE PARTIES AND ORDER - 1

the Court issues its decision on Defendant's motion for summary judgment / adjudication and because the Court's decision on Defendant's motion for summary judgment will likely determine whether certain experts are even necessary. Because the Court's decision on Defendant's motion for summary judgment will likely frame the necessary experts, the parties request that the dates discussed above be continued even if the Court issues its decision on the motion for summary judgment before June 20, 2014 (i.e. the current expert disclosure deadline).

Further, good cause exists to continue the expert discovery dates because an amendment to the scheduling order will cause no prejudice to either party since both parties have agreed to the continuance; and because the adjustment of the discovery cutoff will not affect the other dates set by this Court and the trial date will not need to be continued.

Thus, the parties to this case have stipulated to continue the expert discovery dates as set forth above.

IT IS SO STIPULATED.

Dated: June 18, 2014

Dated: June 18, 2014

EVANS, WIECKOWSKI & WARD, LLP

/s/ Daniel Jay

JAMES K. WARD DANIEL JAY

Attorneys for Defendant TWAIN HARTE COMMUNITY SERVICES DISTRICT

LAW OFFICES OF RICHARD N. KOSS

/s/ Richard N. Koss

RICHARD N. KOSS Attorney for Plaintiff YVONNE HILTON

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DECLARATION OF DANIEL JAY

I, Daniel Jay, do hereby declare and say the following:

1. I am one of the attorneys of record for Defendant in the above-entitled action. I have prepared this Declaration as evidence in support of the parties' stipulation and request to this Court to continue the expert discovery cutoff and related dates. The facts stated in the stipulation set forth above are true and correct and based upon my personal knowledge.

I declare under the penalty of perjury under the laws of the United States of America that the facts stated above in the stipulation of the parties is true and correct. This Declaration was executed on June 18, 2014 in Sacramento, California.

/s/ Daniel Jay

DECLARATION OF RICHARD KOSS

I, Richard Koss, do hereby declare and say the following:

1. I am one of the attorneys of record for Plaintiff in the above-entitled action. I have prepared this Declaration as evidence in support of the parties' stipulation and request to this Court to continue the expert discovery cutoff and related date. The facts stated in the stipulation set forth above are true and correct and based upon my personal knowledge.

I declare under the penalty of perjury under the laws of the United States of America that the facts stated above in the stipulation of the parties is true and correct. This Declaration was executed on June 18, 2014 in Redwood City, California.

/s/ Richard Koss

1	ORDER	
2	Based upon the stipulation of the parties and good cause appearing, the Court orders that	
3	the initial expert disclosure deadline be extended to June 27, 2014; that the rebuttal expert	
4 5	disclosure deadline be extended to July 10, 2014; and that the expert discovery deadline be	
6	extended to August 8, 2014. All other deadlines set forth in the scheduling order shall remain	
7	unchanged.	
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9	DATED: <u>6/18/2014</u> <u>/s/ SANDRA M. SNYDER</u> UNITED STATES MAGISTRATE JUDGE	
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	STIPULATION OF THE PARTIES AND ORDER - 4	