

1 **JAMES K. WARD, ESQ. (SBN 117639)**
 2 **DANIEL P. JAY, ESQ. (SBN 215860)**
 3 EVANS, WIECKOWSKI & WARD, LLP
 4 745 University Avenue
 5 Sacramento, CA 95825
 6 Telephone: (916)923-1600
 7 Facsimile: (916)923-1616
 8 Attorneys for Defendant
 9 TWAIN HARTE COMMUNITY SERVICES DISTRICT
 10 **PUBLIC ENTITY-FILING FEE WAIVED**

11 UNITED STATES DISTRICT COURT
 12 EASTERN DISTRICT OF CALIFORNIA

13 YVONNE HILTON ,)	Case No. 1:12-CV-01360-SMS
)	
14 Plaintiff,)	STIPULATION AND DECLARATION;
)	ORDER RE: EXPERT DISCOVERY
15 vs.)	
)	
16 TWAIN HARTE COMMUNITY)	
17 SERVICES DISTRICT, and DOES ONE)	
18 THROUGH TWENTY, Inclusive,)	
)	
19 Defendants,)	
)	
)	

20 IT IS HEREBY STIPULATED by Plaintiff, YVONNE HILTON, by and through her
 21 attorneys, and Defendant, TWAIN HARTE COMMUNITY SERVICES DISTRICT, by and
 22 through its attorneys, that the initial expert disclosure deadline of June 20, 2014 be continued to
 23 June 27, 2014; that the rebuttal expert disclosure deadline of July 3, 2014 be continued to July
 24 10, 2014; and that the expert discovery deadline of August 1, 2014 be continued to August 8,
 25 2014.

26 The parties submit that good cause exists to continue the dates set forth above because it
 27 will allow the parties to avoid the expense of retaining experts and finalizing expert reports until
 28

1 the Court issues its decision on Defendant's motion for summary judgment / adjudication and
2 because the Court's decision on Defendant's motion for summary judgment will likely determine
3 whether certain experts are even necessary. Because the Court's decision on Defendant's motion
4 for summary judgment will likely frame the necessary experts, the parties request that the dates
5 discussed above be continued even if the Court issues its decision on the motion for summary
6 judgment before June 20, 2014 (i.e. the current expert disclosure deadline).
7

8 Further, good cause exists to continue the expert discovery dates because an amendment
9 to the scheduling order will cause no prejudice to either party since both parties have agreed to
10 the continuance; and because the adjustment of the discovery cutoff will not affect the other
11 dates set by this Court and the trial date will not need to be continued.
12

13 Thus, the parties to this case have stipulated to continue the expert discovery dates as set
14 forth above.
15

16 IT IS SO STIPULATED.

17 Dated: June 18, 2014

EVANS, WIECKOWSKI & WARD, LLP

18
19 /s/ Daniel Jay

20 _____
JAMES K. WARD
DANIEL JAY

21
22 Attorneys for Defendant TWAIN HARTE
COMMUNITY SERVICES DISTRICT

23
24 Dated: June 18, 2014

LAW OFFICES OF RICHARD N. KOSS

25 /s/ Richard N. Koss

26 _____
RICHARD N. KOSS
Attorney for Plaintiff YVONNE HILTON

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 disclosure deadline be extended to July 10, 2014; and that the expert discovery deadline be
5 extended to August 8, 2014. All other deadlines set forth in the scheduling order shall remain
6 unchanged.
7

8 DATED: 6/18/2014

9 /s/ SANDRA M. SNYDER
10 UNITED STATES MAGISTRATE JUDGE
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28