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MERCED COUNTY DISTRICT ATTORNEY,
a department of the County of Merced

19 United States District Court

20 Eastern District of California

21 Diane Goins, et al.,
22 Plaintiffs,
23 v.
24 County of Merced, et al.,
25 Defendants.
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Case No. 1:13-cv-01245 AWI SKO

**Stipulation and ~~Proposed~~ Order
Extending Discovery Cut-off**

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1 IT IS HEREBY STIPULATED between William J. Smith, counsel for
 2 plaintiffs herein, Roger S. Matzkind, counsel for defendant County of Merced and
 3 Merced County District Attorney, a department of the County of Merced, and
 4 Laurie Bell Schrum, counsel for defendant Merle Wayne Hutton, that the time for
 5 completion of non-expert and expert discovery and for motions to compel
 6 discovery, and the deadline for non-dispositive motions, are each hereby extended
 7 by thirty (30) days, to the dates set forth below:

	<u>Current Deadline</u>	<u>Stipulated Deadline</u>
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9 Deadline for non-expert witness 10 depositions and motions to compel 11 non-expert discovery	April 30, 2015	June 1, 2015
12 Deadline to disclose expert witnesses	May 22, 2015	June 22, 2015
13 Deadline for expert discovery	July 31, 2015	August 31, 2015
14 Deadline to file non-dispositive 15 Motions	August 19, 2015	Sept 18, 2015
16 Deadline for hearing on non- 17 dispositive motions	Sept 16, 2015	October 16, 2015

18 It is further stipulated that the Settlement Conference currently scheduled
 19 for June 9, 2015 in Courtroom 7 is VACATED.

20 It is further stipulated that the deadline for filing dispositive motions, the
 21 date of the pre-trial conference and trial, and all other deadlines and hearing
 22 dates not set forth above shall remain unchanged.

23 Dated: April 15, 2015

Smith Johnson, Inc.

25 By: /s/ William J. Smith
 26 William J. Smith
 27 Attorney for Plaintiffs,
 Diane Goins and Wesley Rentfrow

28 *(signatures continue on next page)*

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Dated: April 15, 2015

Kroloff, Belcher, Smart, Perry & Christopherson

By: /s/ Laurie Bell Schrum
Laurie Bell Schrum
Attorney for Defendant
Merle Wayne Hutton

Dated: April 15, 2015

James N. Fincher
Merced County Counsel

By: /s/ Roger S. Matzkind
Roger S. Matzkind
Chief Civil Litigator
Attorneys for Defendant County of Merced
and Merced County District Attorney, a
department of the County of Merced

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ORDER

On April 14, 2015, the parties participated in an informal telephonic conference to request a thirty (30) day extension of time for completion of non-expert and expert discovery and non-dispositive motion deadlines in order to pursue private mediation. Pursuant to the parties' agreement to meet and confer to select a mutually agreeable date, time, and mediator for mediation, IT IS HEREBY ORDERED that the dates be extended as follows:

<u>Case Management Event:</u>	<u>Prior-Operative Date-Deadline:</u>	<u>Stipulated-Deadline:</u>
Non-Expert Discovery Deadline	April 30, 2015	June 1, 2015
Expert Disclosures	May 22, 2015	June 22, 2015
Rebuttal-Supplemental Expert Disclosures	June 19, 2015	July 20, 2015
Expert Discovery Deadline	July 31, 2015	August 31, 2015
Non-Dispositive Motion Filing Deadline	August 19, 2015	September 18, 2015
Non-Dispositive Motion Hearing Deadline	September 16, 2015	October 16, 2015
Dispositive Motion (MSJ) Filing Deadline	August 19, 2015	Unchanged
Dispositive Motion (MSJ) Hearing Deadline	September 16, 2015	Unchanged
Settlement Conference	June 9, 2015 10:00 a.m., Ctrm 7	Vacated
Final Pre-Trial Conference	October 28, 2015 2:00 p.m., Ctrm 7	Unchanged
TRIAL	January 5, 2016 8:30 a.m., Ctrm 7 (5-7 trial days)	Unchanged

IT IS SO ORDERED.

Dated: April 21, 2015

/s/ Sheila K. Oberto
UNITED STATES MAGISTRATE JUDGE