

Michael G. Marderosian, No. 77296
Heather S. Cohen, No. 263093
MARDEROSIAN, CERCONE & COHEN
1260 Fulton Mall
Fresno, CA 93721
Telephone: (559) 441-7991
Facsimile: (559) 441-8170

Virginia Gennaro, No. 138877
City Attorney
CITY OF BAKERSFIELD
1501 Truxtun Avenue
Bakersfield, CA 93301
Telephone: (661) 326-3721
Facsimile: (661) 852-2020

Attorneys for: Defendants CITY OF BAKERSFIELD, GREG WILLIAMSON,
SEAN WOESSNER, and ISAAC ALEMAN

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

R.D.G., et al.)	Case No. 1:13-CV-02057-JLT
)	
Plaintiffs,)	STIPULATION TO MODIFY THE
)	SCHEDULING ORDER; DECLARATION
vs.)	OF MICHAEL G. MARDEROSIAN;
)	[PROPOSED] ORDER THEREON
CITY OF BAKERSFIELD, et al.)	
)	(Doc. 53)
Defendants.)	
)	

Following the May 27, 2015 teleconference with the Court, the Parties met and conferred and agreed that the parties should attempt to resolve this matter prior to commencing expert depositions. Accordingly, the Parties stipulate and request that this Court modify the existing Scheduling Order as follows to allow meaningful settlement negotiations to occur:

<u>Deadline</u>	<u>Current Date</u>	<u>Requested Date</u>
Expert Discovery Cutoff	June 12, 2015	July 27, 2015
Deadline to File Dispositive Motions	June 30, 2015	August 14, 2015

1 Deadline to Hear Dispositive Motions August 11, 2015 September 25, 2015
2 Pretrial Conference October 6, 2015 December 8, 2015

3 As is set forth in the Declaration of Michael G. Marderosian submitted herewith, GOOD CAUSE
4 appears to modify the Scheduling Order as requested because the parties are currently attempting to
5 resolve this matter before taking expensive expert depositions and desire to save judicial resources
6 regarding expert discovery and any motion for summary judgment. The parties have scheduled a
7 mediation with mediator Oliver U. Robinson Esq. for June 12, 2015. Should a settlement in principal be
8 reached, it would be subject to City Council approval which also will take additional time.

9 The requested continuances will not, in any way, affect the February 2, 2016 trial date.

10 Dated: May 29, 2015

MARDEROSIAN, CERCONE & COHEN

12 */s/ Michael G. Marderosian*

13 By: _____
14 Michael G. Marderosian,
15 Attorneys for Defendants
 above-named.

16
17 Dated: May 29, 2015

McMURRAY HENRIKS LLP

18 */s/ Randy McMurray*

19 By: _____
20 Randy McMurray,
21 Attorneys for Plaintiffs

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I, Michael G. Marderosian, hereby declare as follows:

1. I am an attorney at law licensed to practice in all courts of the State of California and am the attorney of record for defendants in this matter.

2. The parties are currently attempting to resolve this matter before taking expensive expert depositions and desire to save judicial resources regarding expert discovery and any motion for summary judgment. A mediation is scheduled with mediator Oliver U. Robinson Esq. on June 12, 2015.

3. The requested continuances will not, in any way, affect the February 2, 2016 trial date.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on February 20, 2015, at Fresno, California.

/s/ *Michael G. Marderosian*

MICHAEL G. MARDEROSIAN

1 **ORDER**

2 Based upon the stipulation of counsel, the Court hereby orders that the scheduling order be
3 modified as follows:

4 <u>Deadline</u>	<u>Current Date</u>	<u>New Date</u>
5 Expert Discovery Cutoff	June 12, 2015	July 27, 2015
6 Deadline to File Dispositive Motions	June 30, 2015	August 14, 2015
7 Deadline to Hear Dispositive Motions	August 11, 2015	September 25, 2015
8 Pretrial Conference	October 6, 2015	December 8, 2015

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10 IT IS SO ORDERED.

11 Dated: May 29, 2015

12 /s/ Jennifer L. Thurston
13 UNITED STATES MAGISTRATE JUDGE
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