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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

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

As is set forth in the Declaration of Michael G. Marderosian submitted herewith, GOOD CAUSE appears to modify the Scheduling Order as requested because 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. The parties have scheduled a mediation with mediator Oliver U. Robinson Esq. for June 12, 2015. Should a settlement in principal be reached, it would be subject to City Council approval which also will take additional time.

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

Dated: May 29, 2015

MARDEROSIAN, CERCONE & COHEN

/s/ Michael G. Marderosian

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

Dated: May 29, 2015

McMURRAY HENRIKS LLP

/s/ Randy McMurray

By: _____
Randy McMurray,
Attorneys for Plaintiffs

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

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

/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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