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ATTORNEYS FOR Plaintiff, D.L.

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

D.L.,

Plaintiff,

v.

MARGARET VASSILEV, M.D.; RODOLFO VICENTE, M.D.; MARK WISEMAN, M.D.; PAVEL MUNDL, M.D.; COUNTY OF TULARE; KAWEAH DELTA HEALTHCARE DISTRICT; SANDRA BOSMAN, M.D.; LORI ANN M. BOKEN, M.D.; T. PLUNKETT, RNC; D. BRACKETT, RNC; B. BROWN, RNFA; UNITED STATES OF AMERICA; and Does 10 through 50,

Case No: 1:14-CV-00824-BAM

**APPLICATION AND STIPULATION
FOR ORDER CONTINUING
DISCOVERY DEADLINES AND ORDER
THEREON**

TO: THE HONORABLE MAGISTRATE JUDGE BARBARA A. McAULIFFE:

The parties hereto, by and through their counsel hereby apply to this court for an Order extending the Discovery Cutoffs in the above-captioned matter.

The reason for this request is that the parties need additional time to conduct discovery, including depositions.

In early December, counsel for Plaintiff, D.L., underwent a medical procedure and his recovery took longer than anticipated, causing him to be in and out throughout the month. Due his absence, unfortunately counsel was unable to conduct discovery in this matter.

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Dated: March 28, 2019.

WEISS, MARTIN, SALINAS & HEARST

/s/ Richard Salinas
Richard Salinas, Esq.,
Attorneys for Defendant,
MARGARET VASSILEV, MD

Dated: March 28, 2019.

McCORMICK BARSTOW LLP

/s/ Daniel Wainwright
Daniel Wainwright, Esq.,
Attorneys for Defendants,
MARK WISEMAN, M.D,
SANDRA BOSMAN, M.D.,
LORI BOKEN, M.D.

DATED: March 29, 2019

McGREGOR W. SCOTT
United States Attorney

By: /s/ Victoria L. Boesch
VICTORIA L. BOESCH
Assistant United States Attorney
Attorneys for the United States

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I declare under penalty of perjury under the laws of the state of California that the foregoing is true and correct, and if called upon, could and would testify competently thereto.

Executed in Fresno, California, on this 28th day of March 2019.

/s/ Mark W. Coleman
MARK W. COLEMAN
Attorney for Plaintiff
D.L.

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ORDER

IT IS SO ORDERED, good cause having been shown, based on Counsel’s injury and the government shut down, that the discovery deadlines in this case be continued as follows:

- a. Non-expert discovery shall be completed by June 10, 2019;
- b. Initial Expert disclosures shall be completed by June 21, 2019;
- c. Supplemental expert disclosure shall be completed by July 5, 2019;
- d. Expert discovery shall be completed by August 2, 2019; and
- e. Dispositive motions shall be filed by August 30, 2019.

The Pretrial Conference and Trial dates remain unchanged.

IT IS SO ORDERED.

Dated: March 29, 2019

/s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE