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9 Attorneys for Plaintiffs

10 **UNITED STATES DISTRICT COURT**
 11 **EASTERN DISTRICT OF CALIFORNIA**

12 LAURIE DIGIANTOMASSO and RANDY)
 13 DIGIANTOMASSO, Individually and as Co-)
 14 Successors in Interest of Decedent SHAYMUS)
 15 DIGIANTOMASSO,)

16 Plaintiffs,

17 vs.

18 KINGS COUNTY, a public entity; KINGS)
 19 COUNTY SHERIFF-CORONER DAVID)
 20 ROBINSON, in his individual and official)
 21 capacity; KINGS COUNTY SHERIFF'S)
 22 COMMANDER KIM PEDREIRO, in her)
 23 individual and official capacity; KINGS)
 24 COUNTY SHERIFF'S SERGEANT SHERRI)
 25 HENDERSON; CALIFORNIA FORENSIC)
 26 MEDICAL GROUP, INCORPORATED, a)
 27 California corporation; TAYLOR FITHIAN,)
 28 M.D.; MEGAN NABORS, L.V.N;)
 DANIELLE ECKER; LINDA WEESNER,)
 R.N.; MINNETTA COSTA, R.N.; JANA)
 CEARLEY, L.P.T., and DOES 1-20,)
 individually, jointly, and severally,)

Defendants.

No:1:14-cv-01633-MCE-EPG

STIPULATION AND ORDER
AMENDING CAPTION AND
PRETRIAL SCHEDULING ORDER

1 All parties, by and through their respective counsel, hereby stipulate and agree to amend the
2 caption, and the Pretrial Scheduling Order, as follows:

3 This Court dismissed Defendants Tulare County and Corizon Health, Inc., and their
4 employees from this action. (Doc. 61). The parties therefore stipulate and agree to amend the
5 caption to provide for the correct listing of remaining Defendants in this matter, as set forth on the
6 caption of this stipulation.

7 Further, the parties have agreed to an early mediation with the Honorable Raul A. Ramirez
8 (Ret.), based only on the exchange of voluminous paper discovery, before conducting depositions.
9 The only mediation date that worked with the calendars of the parties, counsel, and Judge Ramirez,
10 was January 12, 2016. Trial in this matter is scheduled to begin March 13, 2017, more than a year
11 from now. To accommodate the mediation, the parties propose amending the Pretrial Scheduling
12 Order. This proposed amendment would not impact the trial or pretrial conference dates.

13 The current fact discovery cutoff is March 14, 2016. To conserve the time and resources of
14 the parties, and limit attorneys' fees and costs incurred by all parties, the parties jointly request that
15 the Pretrial Scheduling Order (Doc. 64) be amended as follows:

EVENT	CURRENT DATE	PROPOSED NEW DATE
Fact discovery cutoff	March 14, 2016	August 1, 2016
Expert disclosures	May 13, 2016	August 15, 2016
Rebuttal expert disclosures	June 2, 2016	August 29, 2016
Expert discovery cutoff (in time for filing dispositive motions)		September 15, 2016
Settlement Conference	June 22, 2016	August 24, 2016
Dispositive motion filing (8 weeks before hearing per court order)	July 21, 2016	October 6, 2016
Dispositive motion hearing	September 15, 2016	December 1, 2016

27 Dated: January 5, 2016

HADDAD & SHERWIN LLP

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/s/ Julia Sherwin
JULIA SHERWIN
Attorneys for Plaintiff

DATED: January 5, 2016

WEAKLEY & ARENDT, LLP

/s/ Brande L. Gustafson*
JAMES J. ARENDT
BRANDE L. GUSTAFSON
Attorneys for Defendants COUNTY OF KINGS;
SHERIFF DAVID ROBINSON; COMMANDER KIM
PEDREIRO; and SERGEANT SHERI HENDERSON

DATED: January 5, 2016

BERTLING & CLAUSEN LLP

/s/ Jemma Parker Saunders*
JEMMA PARKER SAUNDERS
Attorneys for Defendants CALIFORNIA FORENSIC
MEDICAL GROUP, INC.; DANIELLE ECKER;
TAYLOR W. FITHIAN, M.D.; JANA CEARLEY;
LINDA K. WEESNER; MEGAN E. NABORS; and
MINNETTA F. COSTA


*Ms. Gustafson and Ms. Saunders provided their consent that this document be electronically filed.

ORDER

It is HEREBY ORDERED that the caption in this case and the Pretrial Scheduling Order be amended in accordance with the foregoing stipulation.

IT IS SO ORDERED.

Dated: January 11, 2016


MORRISON C. ENGLAND, JR., CHIEF JUDGE
UNITED STATES DISTRICT COURT