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5 Attorneys for Plaintiff
 6 DESIREE MARTINEZ

7
 8 **UNITED STATES DISTRICT COURT**
 9 **EASTERN DISTRICT OF CALIFORNIA**

10 DESIREE MARTINEZ,

11 Plaintiff,

12 vs.

13 KYLE PENNINGTON; KIM PENNINGTON;
 14 CONNIE PENNINGTON; KRISTINA
 HERSHBERGER; JESUS SANTILLAN;
 15 CHANNON HIGH; THE CITY OF CLOVIS;
 16 ANGELA YAMBUPAH; RALPH SALAZAR;
 FRED SANDERS; THE CITY OF SANGER;
 AND DOES 1 through 20,

17 Defendants.

Case No.: 1:15-cv-0683 JAM MJS

**STIPULATION AND ORDER RE:
 MODIFICATION OF DISCOVERY AND
 CASE SCHEDULE**

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 19 TO THE HONORABLE COURT:

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 21 WHEREAS the pleadings remain unsettled, due to the pendency of a motion challenging the
 22 plaintiff's Second Amended Complaint until the Court's ruling on August 9, 2016 (Dkt. No. 55), and
 23 the current pending status of the moving defendants' responsive pleadings; and

24 WHEREAS, the parties agree that the operative pleadings will define the scope of
 25 discovery; and

26 WHEREAS, the parties anticipate that the pleadings will be settled within the next 20 days,
 27 in compliance with the Court's August 9, 2016 Order; and
 28

1 schedule based upon these factors,

2 THE PARTIES HEREBY STIPULATE AS FOLLOWS:

3 The current discovery deadlines should be extended as follows: (a) Non-expert discovery
4 shall be completed by March 15, 2017; (b) Expert witness shall be disclosed by March 15, 2017; (c)
5 Supplemental expert witnesses shall be disclosed by March 29, 2017; and (d) Expert discovery shall
6 be completed by May 26, 2017.

7 The current trial and pretrial deadlines should be extended as follows: (a) Non-dispositive
8 motions shall be filed no later than June 4, 2017; (b) Dispositive motions shall be filed no later than
9 June 27, 2017 and noticed for hearing on July 25, 2017 at 1:30 p.m.; (c) A joint pretrial statement
10 shall be filed on or before September 29, 2017; (d) a pretrial conference shall be held on October 6,
11 2017 at 10:00 a.m.; and (e) Jury trial shall be set for December 4, 2017 at 9:00 a.m.

13 IT IS SO STIPULATED.

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15 Date: August 10, 2016



Kevin G. Little
Law Office of Kevin G. Little
Attorneys for Plaintiff
Desiree Martinez

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18
19 Date: August 10, 2016

/s/ Yan Shrayberman

Yan Shrayberman
Attorney for Defendant
Kyle Pennington

20
21 Date: August 10, 2016

/s/ John Phillips

John W. Phillips
Wild, Carter & Tipton
Attorneys for
Defendants Kim and
Connie Pennington

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Date: August 10, 2016

/s/ Craig Smith
G. Craig Smith
Ferguson, Praet & Sherman
Attorneys for Defendants
City of Clovis, City of Sanger and
Kristina Hershberger, Jesus Santillan, Channon
High, Angela Yambupah, Ralph Salazar and
Fred Sanders

IT IS SO ORDERED **AS MODIFIED ABOVE BY THE COURT:**

Dated: August 12, 2016

/s/ John A. Mendez
U. S. District Court Judge