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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

DESIREE MARTINEZ,

Plaintiff,

vs.

KYLE PENNINGTON; KIM
PENNINGTON; CONNIE
PENNINGTON; KRISTINA
HERHBERGER; JESUS
SANTILLAN; CHANNON HIGH;
THE CITY OF CLOVIS; ANGELA
YAMBUPAH; RALPH SALAZAR;
FRED SANDERS; THE CITY OF
SANGER; and DOES 1 through 20,

No. 1:15-CV-00683 JAM MJS

**SECOND STIPULATION AND
PROPOSED ORDER RE
MODIFICATION OF
SCHEDULING ORDER AND
ORDER**

TO THE HONORABLE COURT:

This stipulation will not affect the current trial date. The parties hereby stipulate to extend the following dates contained in the scheduling order only:

- (1) Expert Rebuttal Disclosure Deadline: June 23, 2017
- (2) Expert Discovery Completion Deadline: July 28, 2017
- (3) Non dispositive motions to be filed by: August 8, 2017
- (4) Dispositive Motions to be filed by: August 15, 2017

1 The remainder of the dates set forth in the August 12, 2016 Stipulation and
2 Order Re: Modification of Discovery and Case Schedule (Doc. 56) and Amended
3 Stipulation and Proposed Order RE Modification of Schedule Order and Order
4 (Doc. 63) are to remain the same.

5 GOOD CAUSES EXISTS AS FOLLOWS:

6 The parties have booked a full day mediation with Ret. U.S. District Court
7 Judge Oliver W. Wanger. To facilitate the mediation the parties desire to reserve
8 expending costly resources conducting expert discovery in this matter. This
9 stipulation will not affect the currently set trial date.

10 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

11
12 Date: May 22, 2017

13 /s/ G. Craig Smith _____
14 G. Craig Smith
15 Ferguson, Praet & Sherman
16 Attorneys for Defendants
17 City of Clovis, City of Sanger and
18 Kristina Hershberger, Jesus Santillan,
19 Channon High, Angela Yambupah, Ralph
20 Salazar and Fred Sanders

21
22 Date: May 22, 2017

23 /s/ Kevin G. Little _____
24 Kevin G. Little
25 Law Office of Kevin G. Little
26 Attorneys for Plaintiff
27 Desiree Martinez

28 Date: May 22, 2017

///
///
/s/ Yan Shrayberman _____
Yan Shrayberman
Attorney for Defendant
Kyle Pennington

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Date: May 22, 2017

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

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: 5/22/2017

/s/ John A. Mendez
John A. Mendez
United States District Court Judge