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9 **Attorneys for Defendants County**
 10 **of Kern and Deputy Reed**

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

13 **D.G., a minor, by and through his) CASE NO. 1:15-CV-00760 JAM-JLT**
 14 **guardian *ad litem*, Denise Bonilla,)**
 15 **individually and as successor-in-interest) JOINT STIPULATION FOR A SHORT**
 16 **to David Garcia, deceased; D.E.G., a) DISCOVERY EXTENSION**
 17 **minor, by and through her guardian *ad*)**
 18 ***litem*, Denise Bonilla, individually and)**
 19 **as successor-in-interest to David Garcia,)**
 20 **deceased; G.D., a minor, by and)**
 21 **through her guardian *ad litem*, Denise)**
 22 **Bonilla, individually and as successor-)**
 23 **in-interest to David Garcia, deceased;)**
 24 **RAMONA RAMIREZ NUNEZ,)**
 25 **individually;)**
 26 **Plaintiffs,)**
 27 **vs.)**
 28 **COUNTY OF KERN; DOES 1)**
THROUGH 10;)
Defendants.)
[ALL PARTIES REQUEST A JURY]

29 **COME NOW** the Parties in this matter, and present this Joint Stipulation for a Short
 30 Discovery Extension.

31 Plaintiffs, D.G., a minor, by and through his guardian ad litem, Denise Bonilla; D.E.G.,
 32 a minor, by and through her guardian ad litem, Denise Bonilla; G.D., a minor, by and through
 33 her guardian ad litem, Denise Bonilla; and Ramona Ramirez Nunez, (hereinafter collectively

1 “Plaintiffs”) are Jointly represented by Matthew C. Clark and Neil K. Gehlawat of Chain-
2 Cohn-Stiles, and Dale K. Galipo of the Law Offices of Dale K. Galipo.

3 Defendants, County of Kern (hereinafter “County”) and Deputy Robert Reed
4 (hereinafter “Reed”), (hereinafter collectively “Defendants”) are represented by Andrew C.
5 Thomson and Kathleen Rivera, Office of Kern County Counsel.

6 Plaintiff and Defendants are hereinafter collectively referred to as the “Parties.”

7 **IT IS HEREBY STIPULATED AND AGREED TO**, by and between the Parties, through
8 their respective counsel of record, that an Order be entered allowing the Parties the following
9 extensions of two weeks: a) Rule 26 Designation of Expert Witnesses to May 20, 2016; b) Rule
10 26 Designation of Supplemental Experts to May 27, 2016; and c) Extend the “all discovery”
11 deadline date for two weeks to July 15, 2016. These proposed dates are each two weeks later
12 than the deadlines set forth in the Scheduling Order.

13 1. The Parties have repeatedly met and conferred regarding discovery and expert
14 witness discovery issues in an effort to informally resolve discovery and expert issues,
15 including deposition scheduling and designation concerns.

16 2. The Parties have been able to schedule the deposition of all witnesses, other
17 than those identified below, within the deadlines established by the Court in coordination with
18 the Rule 26 Designation of Experts deadline.

19 3. Plaintiffs have indicated a desire to take the deposition of the Coroner’s
20 Pathologist but due to schedule conflicts, the Parties have been unable to schedule the
21 deposition.

22 4. Defendants have noticed the depositions of Plaintiffs, and have requested
23 deposition availability information, but due to scheduling conflicts, the Parties have been
24 unable to schedule the depositions.

25 5. In the spirit of civility, cooperation and good faith litigation, neither party has
26 unilaterally scheduled depositions that are in conflict with the schedule of opposing counsel or
27 the deponent.

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1 6. As a result of the need to take the aforementioned depositions, the Parties are
2 concerned that their experts will not have an opportunity to review, analyze and include all of
3 the deposition information in the expert's Rule 26 Expert Designation Report.

4 7. In an effort to ensure that all experts have the opportunity to review all
5 depositions prior to submitting their reports, the Parties request the following extensions of two
6 weeks:

- 7 a) Rule 26 Designation of Expert Witnesses to May 20, 2016;
- 8 b) Rule 26 Designation of Supplemental Experts to May 27, 2016; and
- 9 c) Extend the "all discovery" deadline date for two weeks to July 15, 2016.

10 8. The Parties are informed and believe that the foregoing will not adversely affect
11 the remainder of the dates set forth in the Scheduling Conference Order.

12 9. The Parties respectfully request the Court's consideration of this request.

13 **THEREFORE, IT IS HEREBY STIPULATED:**

14 The Scheduling Conference Order shall be amended to provide for the following
15 deadlines extensions of two weeks:

- 16 a) Rule 26 Designation of Expert Witnesses is extended to May 20, 2016;
- 17 b) Rule 26 Designation of Supplemental Experts is extended to May 27, 2016; and
- 18 c) Extend the "all discovery" deadline date is extended for two weeks to July 15, 2016.

19
20
21 Dated: April 11, 2016

CHAIN-COHN-STILES

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23 By /s/ Neil K. Gehlawat
24 Matthew C. Clark
25 Neil K. Gehlawat
26 Attorneys for Plaintiffs
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Dated: April 11, 2016

THERESA A. GOLDNER, COUNTY COUNSEL

By /s/ Andrew C. Thomson
Andrew C. Thomson, Deputy
Attorneys for Defendants County of
Kern and Deputy Reed

IT IS SO ORDERED.

Dated: April 12, 2016

/s/ John A. Mendez
JOHN A. MENDEZ
UNITED STATES DISTRICT COURT JUDGE

#22M1751