

1 **THERESA A. GOLDNER, COUNTY COUNSEL**  
2 **By: MARSHALL S. FONTES, DEPUTY (SBN 139567)**  
3 **KATHLEEN RIVERA (SBN 211606)**  
4 **Kern County Administrative Center**  
5 **1115 Truxtun Avenue, Fourth Floor**  
6 **Bakersfield, CA 93301**  
7 **Telephone 661-868-3800**  
8 **Fax 661-868-3805**

9 **Attorneys for Defendant County of Kern**

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

12 **JANE DOE, an individual,** ) **CASE NO. 1:15-CV-01637-DAD-JLT**  
13 )  
14 **Plaintiff,** ) **JOINT STIPULATION TO CONTINUE**  
15 **vs.** ) **DISCOVERY CUT OFF DATES;**  
16 ) **[PROPOSED ORDER]**  
17 **COUNTY OF KERN, a municipality;** )  
18 **CESAR NAVEJAR; an individual; and** ) **Trial Date: June 13, 2017**  
19 **DOES 1-10, inclusive,** ) **Action Filed: October 28, 2015**  
20 **Defendants.** )  
21 )

22 COME NOW, Plaintiff, JANE DOE, and Defendants COUNTY OF KERN and CESAR  
23 NAVEJAR, who have met and conferred through their respective attorneys of record, and now  
24 make this joint stipulated request of the Court:

25 **REPRESENTATIONS AND JOINT STIPULATION AND REQUEST:**

26 1. Pursuant to the Scheduling Order (Doc. No. 20) the deadline for completion of  
27 non-expert discovery is September 9, 2016 and the deadline for expert discovery is November  
28 14, 2016. After meeting and conferring, the parties have agreed to a 60 day continuance of both  
deadlines for the reasons set forth below.

29 2. While the parties have been engaged in the timely exchange of multiple sets of  
written discovery requests, no depositions have yet been taken, but are in the process of being  
noticed. Plaintiff has noticed defendant Navajer's deposition for July 6, 2016. While  
defendants wish to schedule the deposition of plaintiff, there are several outstanding issues that

1 must be resolved first.

2 3. Presently defendants are seeking juvenile court records concerning the plaintiff,  
3 with a hearing scheduled on the request for June 29, 2016 in the Kern County Superior Court.  
4 The acquisition of these records, to the extent allowed by the Juvenile Court, is necessary before  
5 the defense can notice and properly depose the plaintiff.

6 4. The parties are also engaged in the process of meeting and conferring regarding  
7 the permissible scope of questioning of the plaintiff in her deposition based upon her counsel's  
8 assertion of various rape shield laws. These issues must also be resolved before the plaintiff's  
9 deposition can be completed.

10 5. Defendants also anticipate the potential for a mental examination of plaintiff  
11 after the completion of her deposition, depending upon the substance of her testimony.

12 6. Additionally, it is anticipated that there are approximately 15 other non-expert  
13 depositions which need to be completed after the depositions of the named parties.

14 7. The scheduling of the foregoing discovery has also been complicated by the  
15 County's defense being recently reassigned to counsel unfamiliar with the case on June 4, 2016.  
16 While counsel is expeditiously familiarizing himself with the case, the change in counsel has  
17 caused a short delay in the development of a coordinated discovery plan with all other counsel.

18 8. Therefore, Plaintiff and Defendants stipulate that the Court continue the following  
19 dates and propose the following Discovery Deadlines:

20 Current Date: Proposed New Date:

21 Non-Expert Discovery Deadline: 9/9/2016 11/8/16

22 Expert Disclosure: 9/19/2016 11/18/16

23 Expert Rebuttal Disclosure: 10/7/2016 12/6/16

24 Expert Discovery Deadline: 10/28/2016 12/27/16

25 The requested continuance is limited to aforementioned discovery deadlines and will  
26 not impact the settlement conference, pretrial conference or trial dates as originally set forth in  
27 the Scheduling Order.

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1 Dated: June 21, 2016

**CHAIN-COHN-STILES**

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3 By: /s/ Neil K. Gehlawat  
4 David K. Cohn and Neil K. Gehlawat  
5 Attorneys for Plaintiff, Jane Doe

6 Dated: June 21, 2016

**THERESA A. GOLDNER, COUNTY COUNSEL**

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8 By: /s/ Andrew C. Thomson  
9 Marshall S. Fontes and Kathleen Rivera  
10 Attorneys for Defendant, County of Kern

11 Dated: June 21, 2016

**WEAKLEY AND ARENDT**

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13 By: /s/ James D. Weakley  
14 James D. Weakley and Leslie M. Dillahunty  
15 Attorneys for Defendant, Cesar Navejar

**ORDER**

16 Good cause appearing, based upon a sufficient showing of diligence since the issuance of  
17 the scheduling report on April 5, 2016 and sufficient reason to believe the parties cannot comply  
18 with the current case schedule, the Court **GRANTS** the request to amend the case schedule as  
19 follows:

20 1. All non-expert SHALL be completed no later than **November 18, 2016** and all  
21 expert discovery SHALL be completed no later than **December 27, 2016**;

22 2. Experts SHALL be disclosed no later than **November 18, 2016** and any rebuttal  
23 experts SHALL be disclosed no later than **December 6, 2016**;

24 3. Any nondispositive motions may be filed no later than **January 6, 2017** and heard  
25 no later than **February 3, 2017**.

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**The Court does not contemplate that any other changes to the case schedule will be sought or granted.**

IT IS SO ORDERED.

Dated: **June 23, 2016**

**/s/ Jennifer L. Thurston**  
UNITED STATES MAGISTRATE JUDGE

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**[PROPOSED] ORDER**

For GOOD CAUSE shown, and based upon the mutual Stipulation of all parties to this action, the court hereby continues the following dates:

	<u>Current Date:</u>	<u>New Date:</u>
Non-Expert Discovery Deadline:	9/9/2016	11/8/16
Expert Disclosure:	9/19/2016	11/18/16
Expert Rebuttal Disclosure:	10/7/2016	12/6/16
Expert Discovery Deadline:	10/28/2016	12/27/16

IT IS SO ORDERED.

Dated: June \_\_\_\_, 2016

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HON. JENNIFER L. THURSTON,  
MAGISTRATE JUDGE

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