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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-01641-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 **GEORGE ANDERSON, an individual;** ) **(Doc. 45)**  
19 **and DOES 1-10, inclusive,** )  
20 **Defendants.** )  
21 )

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

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

26 1. Pursuant to the Scheduling Order (Doc. No. 25) the deadline for completion of  
27 non-expert discovery is August 22, 2016. The parties previously raised and discussed the  
28 possibility of a continuance. After meeting and conferring, the parties have agreed to propose  
to take only six currently scheduled depositions beyond the discovery deadline for the reasons  
set forth below, with the court's permission.

2. The parties have been actively engaged in attempting to complete non expert  
discovery prior to the deadline of August 22, 2016. The parties have exchanged written  
discovery, and have issued subpoenas for records disclosed through discovery. Plaintiff has

1 taken the deposition of the defendant, and the parties have noticed 21 depositions to take place  
2 prior to August 22<sup>nd</sup>. In an effort to complete discovery prior to the deadline, the parties are  
3 utilizing Saturday August 13<sup>th</sup> to take the deposition of the Plaintiff. Further, given that there  
4 are two attorneys for Plaintiff and two for the Defendants, the parties are double booking  
5 depositions.

6 3. While the parties are clearly trying to complete discovery by the deadline, some  
7 unanticipated delays have occurred. One County employee set to be deposed is on maternity  
8 leave. One County employee who will be testifying at a Person Most Qualified is scheduled to  
9 serve jury duty on the date of her deposition, and another employee who will be testifying as a  
10 Person Most Qualified is on vacation until after the discovery deadline.

11 4. The effort to complete discovery prior to the deadline has been delayed  
12 somewhat, due to the continuation of the hearing on the County's §827 Petition. The hearing  
13 was scheduled for August 2<sup>nd</sup>, 2016. The Defendants had planned to ask the Juvenile Court to  
14 expedite the Court's ruling on the Petition, and to expedite the redaction of such records. The  
15 Defendants wished to have Plaintiff's records for her deposition. All counsel agreed to continue  
16 Plaintiff's deposition date until August 13<sup>th</sup>, by which time the Defendants anticipated having  
17 Plaintiff's Juvenile court records. However, the Juvenile Court on its own motion vacated the  
18 August 2<sup>nd</sup> date and continued the hearing until August 15<sup>th</sup>, after the Plaintiff's deposition.  
19 The Defendants submit that good cause exists for the continuation of the discovery deadline, so  
20 that the Defendants may obtain Plaintiff's Juvenile court records to assist them in taking the  
21 Plaintiff's deposition.

22 5. Therefore, Plaintiff and Defendants stipulate that the Court allow certain  
23 depositions to be conducted after the discovery deadline as follows:

	<u>Current Date:</u>	<u>Proposed New Date:</u>
24 Plaintiff Jane Doe	8/13/2016	9/8/2016
25 County employee Cherice Jones	8/11/2016	9/7/2016
26 County Employee PMQ		
27 Kathy Lemon	8/17/2016	9/7/2016

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County Employee PMQ

Meesha Elliot 8/17/2016 9/7/2016

Donna Jones 8/18/2016 9/6/2016

Sharolyn Takata 8/18/2016 9/6/2016

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

Dated: August 10, 2016 **CHAIN-COHN-STILES**

By: / s / Neil K. Gehlawat  
Neil K. Gehlawat  
Attorneys for Plaintiff, Jane Doe

Dated: August 10, 2016 **LAW OFFICE OF THOMAS C. SEABAUGH**

By: / s / Thomas C. Seabaugh  
Thomas C. Seabaugh,  
Attorneys for Plaintiff, Jane Doe

Dated: August 10, 2016 **THERESA A. GOLDNER, COUNTY COUNSEL**

By: /s/ Kathleen Rivera  
Kathleen Rivera and Marshall S. Fontes  
Attorneys for Defendant, County of Kern

Dated: August 10, 2016 **WEAKLEY AND ARENDT**

By: / s / James D. Weakley  
James D. Weakley and Leslie M. Dillahunty  
Attorneys for Defendant, George Anderson



1 vacated the August 2<sup>nd</sup> date and continued the hearing until August 15<sup>th</sup>, after the Plaintiff's  
2 deposition.

3 I declare under penalty of perjury under the laws of the State of California that the  
4 foregoing is true and correct.

5 Executed this 10<sup>th</sup> day of August, 2016, at Bakersfield, California.

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/s/ Kathleen Rivera  
Kathleen Rivera, Declarant

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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 deposition dates:

	<u>Current Date:</u>	<u>Proposed New Date:</u>
Plaintiff Jane Doe	8/13/2016	9/8/2016
County employee Cherice Jones	8/11/2016	9/7/2016
County Employee PMQ Kathy Lemon	8/17/2016	9/7/2016
County Employee PMQ Meesha Elliot	8/17/2016	9/7/2016
Donna Jones	8/18/2016	9/6/2016
Sharolyn Takata	8/18/2016	9/6/2016

IT IS SO ORDERED.

Dated: August 10, 2016

/s/ Jennifer L. Thurston  
UNITED STATES MAGISTRATE JUDGE