1	THERESA A. GOLDNER, COUNTY COUNSEL				
2	By: KATHLEEN RIVERA (SBN 211606) MARSHALL S. FONTES, DEPUTY (SBN 139567)				
3	Kern County Administrative Center 1115 Truxtun Avenue, Fourth Floor Bakersfield, CA 93301				
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5	Telephone 661-868-3800 Fax 661-868-3805				
6	Attorneys for Defendant County of Kern UNITED STATES DISTRICT COURT				
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9	EASTERN DISTRICT OF CALIFORNIA				
10	JANE DOE, an individual,	CASE NO. 1:15-CV-01641-DAD-JLT			
11) Plaintiff,)	JOINT STIPULATION TO CONTINUE			
12	vs.	DISCOVERY CUT OFF DATES;			
13) COUNTY OF KERN, a municipality;)	[PROPOSED ORDER]			
14	GEORGE ANDERSON, an individual;) and DOES 1-10, inclusive,)) (Doc. 45)			
15	Defendants.				
16))				
17	COME NOW, Plaintiff, JANE DC	DE, and Defendants COUNTY OF KERN and			
18	GEORGE ANDERSON, who have met and conferred through their respective attorneys of				
19	record, and now make this joint stipulated request of the Court:				
20	REPRESENTATIONS AND JOIN	Γ STIPULATION AND REQUEST:			
21	1. Pursuant to the Scheduling Order (Doc. No. 25) the deadline for completion of				
22	non-expert discovery is August 22, 2016. The parties previously raised and discussed the				
23	possibility of a continuance. After meeting and conferring, the parties have agreed to propose				
24	to take only six currently scheduled depositions beyond the discovery deadline for the reasons				
25	set forth below, with the court's permission.				
26	2. The parties have been actively engaged in attempting to complete non expert				
27	discovery prior to the deadline of August 22, 2016. The parties have exchanged written				
28	discovery, and have issued subpoenas for re-	ecords disclosed through discovery. Plaintiff has			

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

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3. While the parties are clearly trying to complete discovery by the deadline, some unanticipated delays have occurred. One County employee set to be deposed is on maternity 7 leave. One County employee who will be testifying at a Person Most Qualified is scheduled to 8 serve jury duty on the date of her deposition, and another employee who will be testifying as a 9 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 somewhat, due to the continuation of the hearing on the County's §827 Petition. The hearing 12 was scheduled for August 2nd, 2016. The Defendants had planned to ask the Juvenile Court to 13 14 expedite the Court's ruling on the Petition, and to expedite the redaction of such records. The Defendants wished to have Plaintiff's records for her deposition. All counsel agreed to continue 15 Plaintiff's deposition date until August 13th, by which time the Defendants anticipated having 16 Plaintiff's Juvenile court records. However, the Juvenile Court on its own motion vacated the 17 August 2nd date and continued the hearing until August 15th, after the Plaintiff's deposition. 18 The Defendants submit that good cause exists for the continuation of the discovery deadline, so 19 that the Defendants may obtain Plaintiff's Juvenile court records to assist them in taking the 20 Plaintiff's deposition. 21

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

24	Cur	rent Date:	Proposed New Date:
25	Plaintiff Jane Doe	8/13/2016	9/8/2016
26	County employee Cherice Jones	8/11/2016	9/7/2016
27	County Employee PMQ		
28	Kathy Lemon	8/17/2016	9/7/2016

1	County Employee PMQ			
2	Meesha Elliot		8/17/2016	9/7/2016
3	Donna Jones		8/18/2016	9/6/2016
4	Sharolyn Takata		8/18/2016	9/6/2016
5	The requested continuance	ntinuance is limited to aforementioned depositions and will not impact		
6	expert discovery, the settlement conference, pretrial conference or trial dates as originally set			
7	forth in the Scheduling Order.			
8	Dated: August 10, 2016	СНА	IN-COHN-STIL	ES
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10		By: _	/ s / Neil K. Gel Neil K. Gehlaw	
11				laintiff, Jane Doe
12				
13	Dated: August 10, 2016	LAW	OFFICE OF TI	HOMAS C. SEABAUGH
14				
15		By: _	/ s / Thomas C. Thomas C. Seal	-
16				laintiff, Jane Doe
17				
18	Dated: August 10, 2016	THE	RESA A. GOLD	NER, COUNTY COUNSEL
19		By	/s/ Kathleen Riv	7010
20		By: <u>/s/ Kathleen Rivera</u> Kathleen Rivera and Marshall S. Fontes		
21			Attorneys for D	efendant, County of Kern
22	Dated: August 10, 2016	WF	AKLEY AND AI	PENDT
23	Dated. August 10, 2010			
24		By: _	/ s / James D. W James D. Weak	eakley ley and Leslie M. Dillahunty
25			Attorneys for D	efendant, George Anderson
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	Joint Stipulation to Continue Discovery Cut-	Off Dates		

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DECLARATION OF KATHLEEN RIVERA REGARDING STIPULATION FOR DISCOVERY CONTINUANCE

1. I am an attorney with Kern County Counsel's office, and am attorney of record for the County of Kern in this matter. The statements made in this declaration are true of my own knowledge; if called upon as a witness, I could and would competently testify to them.

7 2. After meeting and conferring, the parties have agreed to continue four
8 depositions beyond the discovery deadline of August 22, 2016. All sides agree this stipulation
9 does not involve a continuance of any scheduled court hearing or the trial of this matter.

10 3. The parties have been actively engaged in attempting to complete non expert 11 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 12 13 taken the deposition of the defendant, and the parties have noticed 21 depositions to take place prior to August 22nd. In an effort to complete discovery prior to the deadline, the parties are 14 utilizing Saturday August 13th to take the deposition of the Plaintiff. Further, given that there 15 are two attorneys for Plaintiff and two for the Defendants, the parties are double booking 16 17 depositions.

18 4. The parties have encountered some discovery delays, such as the unavailability
19 prior to the deadline of two County employees who are being deposed: one is on maternity
20 leave and the other who will be testifying as a Person Most Qualified is on vacation until after
21 the discovery deadline.

5. The parties effort to complete discovery prior to the deadline has been delayed
somewhat, due to the continuation of the hearing on the County's §827 Petition. The hearing
was scheduled for August 2nd, 2016. The Defendants had planned to ask the Juvenile Court to
expedite the Court's ruling on the Petition, and to expedite the redaction of such records. The
Defendants wished to have Plaintiff's records for her deposition. All counsel agreed to
continue Plaintiff's deposition date until August 13th, by which time the Defendants anticipated
having Plaintiff's Juvenile court records. However, the Juvenile Court on its own motion

1	vacated the August 2 nd date and continued the hearing until August 15 th , 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 th day of August, 2016, at Bakersfield, California.					
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7	/s/ Kathleen Rivera					
8	Kathleen Rivera, Declarant					
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	Joint Stipulation to Continue Discovery Cut-Off Dates					

1	[PROPOSED] ORDER				
2	For GOOD CAUSE shown, and based upon the mutual Stipulation of all parties to this				
3	action, the court hereby continues the follo	wing deposition date	s:		
4		Current Date:	Proposed New Date:		
5	Plaintiff Jane Doe	8/13/2016	9/8/2016		
6	County employee Cherice Jones	8/11/2016	9/7/2016		
7	County Employee PMQ				
8	Kathy Lemon	8/17/2016	9/7/2016		
9	County Employee PMQ				
10	Meesha Elliot	8/17/2016	9/7/2016		
11	Donna Jones	8/18/2016	9/6/2016		
12	Sharolyn Takata	8/18/2016	9/6/2016		
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15	IT IS SO ORDERED.				
16	Dated: August 10, 2016		nnifer L. Thurston		
17		UNITED STA	ATES MAGISTRATE JUDGE		
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	Joint Stipulation to Continue Discovery Cut-Off Dates				