

1 This request for a continuance is based upon the anticipated need of defense counsel, Mr.
2 Fontes, to undergo an inpatient knee replacement, and the surrounding circumstances that has
3 caused a delay in its scheduling of discovery, as set forth in the accompanying declaration.
4 Additionally, there are unresolved discovery disputes which plaintiff maintains are critical, including
5 defendants' opposition to the taking of the deposition of Sheriff Youngblood and allowing
6 videotaping of Lerdo. These are in various states of meet and confer, including defendant reviewing
7 a joint statement submitted by plaintiff last week. Plaintiff's counsel was respectful of defense
8 counsel's medical problems thus slowing the progression of the disputes. The parties therefore
9 stipulate that a continuance of the current scheduled dates in this case is necessary to allow
10 sufficient time for the defense counsel's surgery and recovery, and to accommodate the litigants'
11 schedules, and request the schedule in this case be amended to reflect the following requested
12 dates:

13 NOW THEREFORE, IT IS STIPULATED BY AND BETWEEN THE PARTIES,
14 THROUGH THEIR RESPECTIVE COUNSEL THAT GOOD CAUSE EXISTS TO
15 CONTINUE ALL DATES AS FOLLOWS:

16 That the dates set forth in the Court's order on November 28, 2017 (Doc. No. 46) shall
17 be continued approximately 120 days allowing both sides to properly complete discovery and to
18 allow defendants to have the full participation of their counsel in this process and in the
19 litigation.

20 All discovery, with the exception of expert discovery, shall be completed by **Monday,**
21 **July 30, 2018;**

22 All counsel are to designate in writing, file with the Court, and serve upon all other
23 parties the name, address, and area of expertise of each expert they propose to tender at trial not
24 later than **Thursday, September 30, 2018;**

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