

1 Michael G. Marderosian, No. 77296
 2 Heather S. Cohen, No. 263093
 3 MARDEROSIAN & COHEN
 4 1260 Fulton Street
 5 Fresno, CA 93721
 6 Telephone: (559) 441-7991
 7 Facsimile: (559) 441-8170

8 Virginia Gennaro, No. 138877
 9 City Attorney
 10 CITY OF BAKERSFIELD
 11 1501 Truxtun Avenue
 12 Bakersfield, CA 93301
 13 Telephone: (661) 326-3721
 14 Facsimile: (661) 852-2020

15 Attorneys for: Defendants CITY OF BAKERSFIELD, JUAN OROZCO, and LINDY DEGEARE

16 UNITED STATES DISTRICT COURT
 17 EASTERN DISTRICT OF CALIFORNIA

18 GILBERTO FAJARDO,)	Case No. 1:16-CV-00699-JLT
)	
19 Plaintiff,)	STIPULATION TO MODIFY THE
)	SCHEDULING ORDER [DKT. NO. 36];
20 vs.)	[PROPOSED] ORDER THEREON
)	(Doc. 36)
21 CITY OF BAKERSFIELD; JUAN)	
22 OROZCO; LINDY DEGEARE; and)	
DOES 1 THROUGH 10, inclusive,)	
)	
23 Defendants.)	

24 **RECITALS**

- 25 1. WHEREAS, on May 30, 2018 this Court issued its Scheduling Order [Dkt. No. 36].
- 26 2. WHEREAS, on May 16, 2019 the Parties filed a Stipulation to Modify the Scheduling Order
- 27 [Dkt. No. 39] to extend the time for expert disclosures and expert discovery cutoff and the Court issued an
- 28 Order granting same on May 17, 2019 [Dkt. No. 40].

1 3. WHEREAS, due to the number of expert witnesses in this catastrophic injury case who are
2 dependent on one another in terms of their analysis and given the volume of materials and complicated facts
3 of the case, the Parties require additional time to prepare their expert disclosures and conduct expert discovery
4 and request that the deadlines be extended by three weeks as set forth in the below Stipulation.

5 4. WHEREAS, the requested extension will not in any way affect the Pretrial Conference date
6 of December 16, 2019, or the Trial date of February 10, 2020.

7 **STIPULATION**

8 IT IS HEREBY STIPULATED by and between the Parties hereto through their respective
9 attorneys of record that the following deadlines be continued as follows:

<u>Deadline</u>	<u>Current Date</u>	<u>Requested Date</u>
10 Non-Dispositive Motions	August 27, 2019	September 17, 2019
11 Expert Disclosures	August 28, 2019	September 18, 2019
12 Hearing on Non-Dispositive Motions	September 24, 2019	October 15, 2019
13 Rebuttal Expert Disclosures	September 30, 2019	October 21, 2019
14 Dispositive Motions	October 7, 2019	October 28, 2019
15 Expert Discovery Cutoff	October 14, 2019	November 4, 2019
16 Hearing on Dispositive Motions	November 18, 2019	December 13, 2019

17 Dated: August 22, 2019

MARDEROSIAN & COHEN

/s/ Michael G. Marderosian

18 By: _____

19 Michael G. Marderosian,
20 Attorneys for Defendants

21 Dated: August 22, 2019

LAW OFFICES OF DALE K. GALIPO

/s/ Dale K. Galipo

22 By: _____

23 Dale K. Galipo,
24 Attorneys for Plaintiff

25 Dated: August 22, 2019

CHAIN COHN STILES

/s/ David K. Cohn

26 By: _____

27 David K. Cohn,
28

Attorneys for Plaintiff

IT IS SO ORDERED.

Dated: August 22, 2019

/s/ Jennifer L. Thurston
UNITED STATES MAGISTRATE JUDGE

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28