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11	Telephone: (916) 554-2702 Facsimile: (916) 554-2900					
12	Attorneys for Defendants					
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14	IN THE UNITED STATES DISTRICT COURT					
15	EASTERN DISTRICT OF CALIFORNIA					
16						
17	ISSAM ELIE KNICKERBOCKER,	Case No. 1:16-cv-01811-DAD-JLT				
18	Plaintiff,	STIPULATION AND PROPOSED ORDER TO MODIFY SCHEDULING ORDER				
19	V.	(Doc. 65)				
20	UNITED STATES OF AMERICA; UNITED STATES DEPARTMENT OF INTERIOR,					
21	NATIONAL PARK SERVICE, DEATH VALLEY NATIONAL PARK; NICOLE					
22	GRUVER; BRYAN DREW; and DOES 3–25,					
23	Defendants.					
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STIPULATION AND PROPOSED ORDER TO MODIFY SCHEDULING ORDER

IT IS HEREBY STIPULATED, by and between the parties through their undersigned counsel, that the Scheduling Order (ECF No. 59) be modified as follows:

	Current Deadline	Proposed Deadline
Non-Expert Discovery Cutoff	January 31, 2019	March 1, 2019
Initial Expert Disclosures	February 15, 2019	March 15, 2019
Rebuttal Expert Disclosures	March 15, 2019	April 19, 2019
Expert Discovery Cutoff	April 12, 2019	May 17, 2019
Non-Dispositive Motion Filing	April 23, 2019	May 21, 2019
Non-Dispositive Motion Hearing	May 21, 2019	June 18, 2019
Dispositive Motion Filing	June 4, 2019	July 2, 2019
Dispositive Motion Hearing	July 16, 2019	August 6, 2019
Settlement Conference	September 6, 2019	September 6, 2019
Pretrial Conference	September 23, 2019	October 21, 2019
Trial	November 19, 2019	December 10, 2019

The reasons for this stipulation are as follows:

- 1. Plaintiff's counsel's home and law practice were impacted by the Woolsey Fire, which burned approximately 97,000 acres in Los Angeles and Ventura Counties from November 8 to 16, 2018. To date, he and his family remain evacuated due to ongoing clean-up activities and utility outages. His files and records are located in Malibu, California, and have been inaccessible.
- 2. Defendants' counsel substituted into this case on November 7, 2018. Defendants' prior counsel of record left the United States Attorney's Office on November 30, 2018. Defendants' new counsel was required to spend significant time in November reviewing and analyzing the case file.

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and the parties believe there is good cause to continue most of the remaining deadlines in the Scheduling					
Order by approximately 30 days, as set forth above.					
Dated: December 6, 2018		KNICKERBOCKER LAW FIRM			
	Ву:	/s Richard L. Knickerbocker (authorized 12/6/2018) Richard L. Knickerbocker			
		Attorney for Plaintiff			
Dated: December 7, 2018		McGREGOR W. SCOTT United States Attorney			
	By:	/s Joseph B. Frueh JOSEPH B. FRUEH Assistant United States Attorney			
		Attorneys for Defendants			
	Ol	RDER			
Based upon the stipulation, the Court ORDERS the case schedule to be amended as follows:					
Non-Expert Discovery Cutoff	:	March 1, 2019			
2. Expert Disclosures:		March 15, 2019			
3. Rebuttal Expert Disclosures:		April 19, 2019			
4. Expert Discovery Cutoff:		May 17, 2019			
5. Non-Dispositive Motion Filin	g:	May 21, 2019			
6. Non-Dispositive Motion Hear	ing:	June 18, 2019			
7. Dispositive Motion Filing:		July 2, 2019			
8. Dispositive Motion Hearing:		August 6, 2019			
9. Pretrial Conference:		October 21, 2019, 2:30 p.m.			
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	Order by approximately 30 days, as set forth Dated: December 6, 2018 Dated: December 7, 2018 Based upon the stipulation, the Court 1. Non-Expert Discovery Cutoff 2. Expert Disclosures: 3. Rebuttal Expert Disclosures: 4. Expert Discovery Cutoff: 5. Non-Dispositive Motion Filin 6. Non-Dispositive Motion Hear 7. Dispositive Motion Hearing: 8. Dispositive Motion Hearing:	Order by approximately 30 days, as set forth above Dated: December 6, 2018 By: Dated: December 7, 2018 By: Old Based upon the stipulation, the Court ORD 1. Non-Expert Discovery Cutoff: 2. Expert Disclosures: 3. Rebuttal Expert Disclosures: 4. Expert Discovery Cutoff: 5. Non-Dispositive Motion Filing: 6. Non-Dispositive Motion Hearing: 7. Dispositive Motion Hearing: 8. Dispositive Motion Hearing:			

1	10.	Trial:	December 17, 2019 ¹ , 1:00 p.m.		
2		DDEDED			
3	IT IS SO ORDERED.				
4	Dated:	December 10, 201	8 /s/ Jennifer L. Thurston UNITED STATES MAGISTRATE JUDGE		
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¹ The stipulation failed to allow for eight weeks between the pretrial conference and the trial.