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10 Attorneys for Defendant, Reyes Soberon, Jr.

11 **UNITED STATES DISTRICT COURT**  
12 **FOR THE EASTERN DISTRICT OF CALIFORNIA**

13 KIM ADAMS, an individual, ) CASE NO. 1:17-cv-00464-LJO-JLT  
14 Plaintiff, )  
15 vs. ) **STIPULATION TO STAY DISCOVERY**  
16 ) **RELATING TO DEFENDANT REYES**  
17 ) **SOBERON, JR.; [Proposed] ORDER**  
18 ) **(Doc. 20)**  
19 COUNTY OF KERN; KERN COUNTY )  
20 PROBATION DEPARTMENT; DAVID M. )  
21 KUGE, an individual; REYES SOBERON, )  
22 JR., and individual; and DOES 1 through 50, )  
23 inclusive, )  
24 Defendants. )

25 IT IS HEREBY STIPULATED AND AGREED by and between the attorneys for their  
26 respective parties that, all forms of discovery relating in any way to statements made by  
27 defendant Reyes Soberon, Jr., which are protected by his Fifth Amendment rights, shall be  
28 stayed pending the completion of the related criminal trial in *The People of the State of*  
*California vs. Reyes Soberon, Jr.*, Kern County Superior Court Case Number BF162579A. The  
criminal jury trial is currently set for November 13, 2017, but has the potential to be continued  
out to early 2018.

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Stipulation to Stay Discovery Relating to  
Defendant Reyes Soberon, Jr.; [Proposed] Order

1 It is further stipulated that this stay does not affect discovery as to any other party in this  
2 case.

3  
4 DATED: August 4, 2017

WEAKLEY & ARENDT, LLP

5 /s/ Brande L. Gustafson

James D. Weakley

6 Brande L. Gustafson

Attorneys for Defendant, Reyes Soberon, Jr.

7  
8 DATED: August 4, 2017

MARK L. NATIONS,  
INTERIM KERN COUNTY COUNSEL

9 /s/ Marshall S. Fontes (As authorized on 8/04/17)

Marshall S. Fontes, Deputy County Counsel

10 James Brannen, Deputy County Counsel

Attorneys for Defendants County of Kern, Kern

11 County Probation Department, and David M. Kuge

12 DATED: August 4, 2017

GERAGOS & GERAGOS

13 /s/ Ben J. Meiselas (As authorized on 8/04/17)

Mark J. Geragos

14 Ben J. Meiselas

Noah Geldberg

15 Alex Alarcon

Attorneys for Plaintiff Kim Adams

16  
17 **[Proposed] ORDER**

18  
19 IT IS SO ORDERED.

20 Dated: August 4, 2017

/s/ Jennifer L. Thurston

21 UNITED STATES MAGISTRATE JUDGE