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Attorneys for Plaintiff KIM ADAMS

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF CALIFORNIA

KIM ADAMS, an individual;

Plaintiff,

vs.

COUNTY OF KERN;
KERN COUNTY PROBATION
DEPARTMENT;
DAVID M. KUGE, an individual;
REYES SOBERON, JR., an individual;
and
DOES 1 through 50, inclusive

Defendants.

Case No.: 1:17-cv-00464 JLT

JOINT STIPULATION TO EXTEND DATES AND DEADLINES; [PROPOSED] ORDER

LOCATION: Federal Courthouse
510 19th Street
Suite 200
Bakersfield, CA 93301

Complaint filed: March 31, 2017
Trial Date: January 27, 2020

TO THE HONORABLE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that Plaintiff KIM ADAMS, an individual, and Defendants COUNTY OF KERN; KERN COUNTY PROBATION DEPARTMENT; DAVID M. KUGE, an individual; REYES SOBERON, JR., an individual; and DOES 1 through 50 (hereafter collectively the “parties”), by and through their counsel of record, hereby stipulate and agree as follows:

WHEREAS the parties entered a previous Joint Stipulation to Extend Dates and Deadlines that was approved by the Court on September 13, 2018.

WHEREAS Plaintiff's son subsequently sustained serious gunshot wounds on February 11, 2019;

WHEREAS Plaintiff's son is currently hospitalized in critical condition and Plaintiff must attend to his medical care under these dire circumstances;

WHEREAS Plaintiff's obligations to her son have limited her availability and rendered her unable to sit for deposition and submit to other discovery requests, such as a mental health examination pursuant to Rule 35, until late May 2019;

WHEREAS the parties have diligently pursued discovery in this matter, having produced documents and scheduled depositions of all defense witnesses;

WHEREAS on March 13, 2019, the remittitur in Plaintiff's appeal of her state case in the California Court of Appeal, Fifth Appellate District (Case No. F075266) was issued affirming the trial court's order denying Adams's petition for relief from the claim presentation requirements. Defendants, not knowing what state law claims Plaintiff would amend to include in this action had Plaintiff prevailed, were reluctant to take Plaintiff's deposition prior to the resolution of the appeal;

WHEREAS the parties have agreed to extend the dates and deadlines in this matter as outlined below:

Event/Deadline	Existing Date	Stipulated New Date
Non-Expert Discovery Deadline	May 3, 2019	July 3, 2019
Expert Witness Designation	May 17, 2019	July 17, 2019
Rebuttal Witness Designation	June 14, 2019	August 14, 2019
Expert Discovery Deadline	July 8, 2019	September 9, 2019

Non-Dispositive Motion Deadline (Filing)	July 22, 2019	September 23, 2019
Non-Dispositive Motion Deadline (Hearing)	August 19, 2019	October 21, 2019
Dispositive Motion Deadline (Filing)	September 3, 2019	November 4, 2019
Dispositive Motion Deadline (Hearing)	October 15, 2019	December 16, 2019
Final Pre-Trial Conference	December 2, 2019	February 3, 2020
Trial	January 27, 2020	March 30, 2020

WHEREAS, the parties agree that there is good cause for these stipulated changes in dates and deadlines.

THEREFORE, the parties hereby stipulate to the changes in all dates and deadlines as outlined above.

IT IS SO STIPULATED.

DATED: April 19, 2019

GERAGOS & GERAGOS, APC

By: /s/Ben Meiselas
BEN J. MEISELAS
NOAH GELDBERG
Attorneys for Plaintiff
KIM ADAMS

DATED: April 19, 2019

WEAKLEY & ARENDT
A PROFESSIONAL CORPORATION

By: /s/James D. Weakley
James D. Weakley
Brande L. Gustafson
Attorneys for Defendant, Reyes Soberon,
Jr.

DATED: April 19, 2019

MARGO RAISON,
KERN COUNTY COUNSEL

By: /s/Marshall S. Fontes
Marshall S. Fontes, Deputy County
Counsel
Attorneys for Defendants County of
Kern, Kern County Probation
Department, and David M. Kuge

[PROPOSED] ORDER

IT IS SO ORDERED.

Dated: April 23, 2019

/s/ Jennifer L. Thurston
UNITED STATES MAGISTRATE JUDGE