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11 Attorneys for Defendant, Reyes Soberon, Jr.

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UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

12 KIM ADAMS, an individual,) CASE NO. 1:17-cv-00464-JLT
13 Plaintiff,)
14 vs.) **STIPULATION AND [Proposed] ORDER**
15) **TO MODIFY SCHEDULING ORDER**
16) (Doc. 464)
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COUNTY OF KERN; KERN COUNTY)
PROBATION DEPARTMENT; DAVID M.)
KUGE, an individual; REYES SOBERON,)
JR., and individual; and DOES 1 through 50,)
inclusive,)
Defendants.)

19 The parties, by and through their respective counsel, have stipulated to modify the
20 discovery deadlines and existing Scheduling Order (Doc. No. 36) as follows:

Event/Deadline	Existing Date	Stipulated New Date
Non-Expert Discovery Deadline	July 3, 2019	September 3, 2019
Expert Witness Disclosure	July 17, 2019	September 10, 2019
Rebuttal Witness Disclosure	August 14, 2019	October 1, 2019
Expert Discovery Deadline	September 9, 2019	October 21, 2019

1 2 3 4	Non-Dispositive Motion Deadline (Filing)	September 23, 2019	November 4, 2019
5 6 7 8	Non-Dispositive Motion Deadline (Hearing)	October 21, 2019	December 16, 2019
9 10 11	Dispositive Motion Deadline (Filing)	November 4, 2019	No Change
12 13 14 15	Dispositive Motion Deadline (Hearing)	December 16, 2019	No Change
16 17 18	Pre-Trial Conference	February 3, 2020	No Change
19 20 21	Trial	March 30, 2020	No Change

22 The parties request an order modifying scheduling order. The parties have been
23 cooperating in scheduling depositions in an effort to conclude non-expert discovery within the
24 time frame set out in the current scheduling order. However, Plaintiff's children and caretaker
25 are either out of town due to an ill family member or have their own medical appointments that
26 prevent them from being available for a deposition prior to the current deadline to complete
27 non-expert discovery. Additionally, counsel for defendants County of Kern and David M. Kuge
28 is scheduled for knee surgery on June 26, 2019 and will be unavailable during the following
three to four weeks while recovering from the surgery and there is no one else in the office with
knowledge of this case that would be able to step in and take the remaining depositions.

The parties believe these there is good cause for the above proposed changes to the
discovery deadlines, which would allow the parties to keep the currently scheduled trial date.

Respectfully Submitted,

DATED: June 20, 2019

WEAKLEY & ARENDT
A PROFESSIONAL CORPORATION

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

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DATED: June 21, 2019

MARGO A. RAISON,
KERN COUNTY COUNSEL

/s/ Marshall S. Fontes (As authorized on 6/21/19)
Marshall S. Fontes, Deputy County Counsel
Attorneys for Defendants County of Kern, Kern
County Probation Department, and David M. Kuge

DATED: June 20, 2019

GERAGOS & GERAGOS

/s/ Noah Geldberg (As authorized on 6/20/19)
Mark J. Geragos
Ben J. Meiselas
Noah Geldberg
Attorneys for Plaintiff Kim Adams

ORDER

IT IS SO ORDERED.

Dated: June 24, 2019

/s/ Jennifer L. Thurston
UNITED STATES MAGISTRATE JUDGE