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12 COUNTY OF KERN, STATE OF CALIFORNIA
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19 Attorneys for Defendants
20 County of Kern, et al.

21 UNITED STATES DISTRICT COURT

22 EASTERN DISTRICT OF CALIFORNIA

23 ANA MARIA GONZALEZ LOPEZ,
24 PEDRO DERKEVORKIAN, AND THE
25 ESTATE OF SERGIO DERKEVORKIAN,

26 Plaintiff,

27 v.

28 COUNTY OF KERN; SHERIFF DONNY
YOUNGBLOOD; BILL WALKER,
DIRECTOR KERN COUNTY MENTAL
HEALTH DEPARTMENT; DEPUTY
ASHLEY MARCUM (#202548); and
DOES 1 through 10, inclusive,

Defendants.

CASE NO.: 1:17-CV-00864-AWI-JLT
STIPULATION TO MODIFY THE
SCHEDULING ORDER; [PROPOSED]
ORDER; DECLARATION OF
MARSHALL S. FONTES RE
EXTRAORDINARY CAUSE

1 BY AND BETWEEN THE PARTIES TO THIS ACTION, THROUGH THEIR
2 COUNSEL OF RECORD:

3 This stipulation is entered into by and between the plaintiff and the defendants,
4 by and through their respective counsel to modify the Scheduling Order in this matter,
5 by continuing all dates by approximately sixty (60) days.

6 1. As set forth in the attached declaration of Marshall S. Fontes, despite
7 the diligence of counsel, the parties have not been able to complete all necessary
8 discovery prior to the close of discovery in this case, due to a family medical
9 emergency suffered by defense counsel, which prevented scheduled discovery from
10 being completed.

11 2. Based on the forgoing, the parties agree through counsel to amend the
12 scheduling order as follows:

<u>Deadline:</u>	<u>Currently:</u>	<u>Proposed:</u>
Discovery cut off:	6/30/18	8/29/18
Expert Disclosure:	9/1/18	10/31/18
Supp. Expert Disclosure:	9/28/18	11/27/18
Expert Discovery Cut Off:	10/27/18	12/28/18
Non Dispositive Motion Filing:	11/19/18	1/18/19
Non-Dispositive Motions:	12/17/18	2/15/19
Dispositive Motion Filing:	1/7/19	3/8/19
Dispositive Motions:	3/18/19	5/17/19
Pre-Trial Conference:	4/30/19	6/29/19
Trial:	7/10/19	9/10/19

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22 3. Additionally, the Court has scheduled a Mandatory Settlement
23 Conference in this matter on October 26, 2018. The parties request that the
24 settlement conference be continued to January 8, 2019 at 1:30 p.m. before Magistrate
25 Thurston.

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1 NOW THEREFORE, IT IS HEREBY STIPULATED by the Parties that the
2 Scheduling Order be modified as set forth above.

3 Dated: July 23, 2018 MARK L. NATIONS, COUNTY COUNSEL

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5 By: /s/ Marshall S. Fontes
6 Marshall S. Fontes, Deputy
7 Attorneys for Defendant, County of Kern

8 Dated: July 23, 2018 KAYE, McLANE, BEDNARSKI & LITT, LLP

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10 By: /s/ Kevin J. LaHue
11 Ronald O. Kay, Esq.
12 Kevin J. LaHue, Esq
13 Attorneys for Plaintiffs, Maria Lopez and
14 Pedro Derkevorkian

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PROPOSED ORDER

THE COURT, HAVING FOUND GOOD CAUSE, AND PER STIPULATION OF COUNSEL, IT IS HEREBY ORDERED that the Scheduling Order be Amended as follows:

<u>Deadline:</u>	<u>Currently:</u>	<u>Amended</u>
Discovery cut off:	7/30/18	8/29/18
Expert Disclosure:	9/1/18	10/31/18
Supp. Expert Disclosure:	9/28/18	11/27/18
Expert Discovery Cut Off:	10/27/18	12/28/18
Non Dispositive Motion Filing:	11/19/18	1/18/19
Non-Dispositive Motions:	12/17/18	2/15/19
Dispositive Motion Filing:	1/7/19	3/8/19
Dispositive Motions:	3/18/19	4/22/19, 1:30 p.m.
Pre-Trial Conference:	4/30/19	6/13/19, 10:00 a.m.
Trial:	7/10/19	8/13/19, 8:30 a.m.

The Mandatory Settlement Conference is continued to January 7, 2019 at 9:00 a.m. before Magistrate Judge Thurston.

IT IS SO ORDERED.

Dated: August 2, 2018

/s/ Jennifer L. Thurston
UNITED STATES MAGISTRATE JUDGE