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9	FOR THE EASTERN DISTRICT OF CALIFORNIA			
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11	STAN SEVERI and MYRANDA SEVERI,	) CASE NO. 1:17-CV-00931-AWI-JLT		
12	Plaintiffs,	STIPULATION AND [Proposed] ORDER TO MODIFY SCHEDULING ORDER FOR		
13	VS.	LIMITED PURPOSE OF DEPOSING RULE 30(b)(6) DESIGNEE SERGEANT		
14	COUNTY OF KERN; KERN COUNTY SHERIFF DONNY YOUNGBLOOD; in his individual capacity; DEPUTY GABRIEL	) PAT McIRVIN		
15		) (Doc. 50)		
16	ROMO, in his individual capacity; and DOES 1 to 100, Inclusive, in their individual	) )		
17	capacities, Defendants.	) )		
18		•		
19	The parties <sup>1</sup> , by and through their respec	ctive counsel, have stipulated to modify the		
20	existing Scheduling Order (Doc. No. 16) as modified by the Stipulation and Order to Modify  Scheduling Order (Doc. No. 44) for the limited purpose of allowing Plaintiff Stan Severi to take			
21				
22	the deposition of Sergeant Pat McIrvin, one of Defendant County of Kern's Rule 30(b)(6)			
23				
24	designees, past the current close of non-expert discovery on March 29, 2019.			
25	Plaintiffs noticed the Rule 30(b)(6) deposition to defendant County of Kern on February			
26	21, 2019. In preparing the Rule 30(b)(6) designees for their deposition, counsel for County of			
27	<sup>1</sup> At present, neither Defendants nor plaintiff Stan Severi know the whereabouts of plaintiff Myranda Severi and thus are not currently able to obtain her consent to this stipulation.			
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	Stipulation & [Proposed] Order to Modify Scheduling Order for Limited Purpose of Deposing Rule 30(b)(6) Designee Sgt. McIrvin			
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1	Kern learned that one of the designees, Sergeant Pat McIrvin, had surgery scheduled, of		
2	immediate medical need, for March 25, 2019 (the same day as the deposition), and would need		
3	at least a week to recover from the surgery, meaning he could not be deposed until after the		
4	close of non-expert discovery.		
5	As a result, the parties stipulate that the current non-expert discovery deadline of March		
6	29, 2019 be extended to April 26, 2019 just for purposes of deposing County of Kern's Rule		
7	30(b)(6) designee Sergeant Pat McIrvin.		
8	Respectfully Submitted,		
9	, , , , , , , , , , , , , , , , , , , ,	AKLEY & ARENDT	
10	)    AP	rofessional Corporation	
11	Dy. /5/J	ames D. Weakley	
12	<sup>2</sup>    Bra	es D. Weakley nde L. Gustafson	
13		orneys for Defendant uty Gabriel Romo	
14	Dated: March 27, 2019 MA	RGO A. RAISON, COUNTY COUNSEL	
15		Gregory J. Kohler (As authorized on 3/26/19)	
16	Gre	gory J. Kohler, Deputy brneys for County of Kern, Kern County Sheriff	
17	Dor Dor	any Youngblood, Aaron Warmerdam, Danae tala, and Demetrius Cummings	
18	3	tara, and Demetrus Cummings	
19	Dated: March 27, 2019 RO	ORIGUEZ & ASSOCIATES	
20		oseph Whittington (As authorized on 3/27/19)	
21	Cha	ntal Trujillo, Esq.	
22		orneys for Plaintiff Stanley Severi	
23	ORE	<u>ER</u>	
24	IT IS SO ODDEDED		
25			
26		/s/ Jennifer L. Thurston UNITED STATES MAGISTRATE JUDGE	
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Stipulation & [Proposed] Order to Modify Scheduling Order for Limited Purpose of Deposing Rule 30(b)(6) Designee Sgt. McIrvin 2