

1 DANIEL T. CLIFFORD, ESQ. – SBN 227632
DENNIS P. GALLAGHER, II, ESQ – SBN 301453
2 CLIFFORD & BROWN
A Professional Corporation
3 Attorneys at Law
Bank of America Building
4 1430 Truxtun Avenue, Suite 900
Bakersfield, CA 93301-5230
5 Tel: (661) 322-6023 Fax: (661) 322-3508

[Filing fee exempt
Gov. Code § 6103]

6 Attorneys for Defendant,
KERN HIGH SCHOOL DISTRICT
7

8 UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT

10 * * *

11 LM, a minor, by and through his Guardian ad
Litem, GRISELDA MARTIN,

12 Plaintiff,

13 vs.

14 KERN HIGH SCHOOL DISTRICT, and
15 DOES 1 to 100, Inclusive,

16 Defendants.

CASE NO. 1:17-CV-01123-DAD-JLT

**STIPULATION TO EXTEND DISCOVERY
DEADLINES; [~~PROPOSED~~] ORDER
THEREON
(Doc. 20)**

17 The parties in the above-captioned matter, Plaintiff, LM, by and through his Guardian as Litem,
18 GRISELDA MARTIN (“Plaintiff”), by and through his attorneys of record, J. Miguel Flores of
19 Rodriguez & Associates, and Defendant KERN HIGH SCHOOL DISTRICT (“Defendant”) (Plaintiff
20 and Defendant are collectively referred to as the “Parties”), by and through its attorneys of record,
21 Daniel T. Clifford and Dennis P. Gallagher, II, of Clifford & Brown, P.C., hereby enter into this
22 Stipulation to Extend Discovery Deadlines, as follows:

23 **RECITALS**

24 WHEREAS the Parties have actively engaged in the discovery process to date, including the
25 exchange of written discovery requests and responses, setting of approximately eight depositions to
26 date, and a request by Defendant to inspect the home of Plaintiff;

27 WHEREAS the Parties anticipate the need for a significant amount of additional non-expert
28

1 and expert discovery;

2 WHEREAS the Parties desire to extend the non-expert and expert discovery deadlines of July
3 27, 2018 and September 21, 2018, respectively, for approximately two months to allow for such further
4 discovery as the Parties deem appropriate.

5 **STIPULATION**

6 **IT IS HEREBY STIPULATED** by and between the Parties that the non-expert discovery
7 deadline of July 27, 2018, be and hereby is continued to September 21, 2018.

8 **IT IS FURTHER STIPULATED** by and between the Parties that the expert discovery
9 deadline of September 21, 2018, be and hereby is continued to October 9, 2018.

10 **IT IS FURTHER STIPULATED** that all other dates and deadlines set by the Court in its
11 Scheduling Order dated November 20, 2017, remain on calendar or may be adjusted by the Court in its
12 discretion.

13 **IT IS FURTHER STIPULATED** that this stipulation may be signed in counterparts.

14
15 DATED: June 26, 2018

CLIFFORD & BROWN

Dennis P. Gallagher, Esq. - /s/

17 By _____

18 DANIEL T. CLIFFORD, ESQ.
19 DENNIS P. GALLAGHER, II, ESQ.
20 Attorneys for Defendant,
KERN HIGH SCHOOL DISTRICT

21 DATED: June ____, 2018

RODRIGUEZ & ASSOCIATES

23
24 By _____

25 DANIEL RODRIGUEZ, ESQ.
26 J. MIGUEL FLORES, ESQ.
27 Attorneys for Plaintiff,
28 L.M., by and through his Guardian ad Litem,
Griselda Martin

1 **ORDER**

2 Based upon the foregoing, the Court **ORDERS**¹:

3 1. The non-expert discovery deadline of July 27, 2018, be and is continued to September
4 21, 2018;

5 2. The expert discovery deadline of September 21, 2018, be and hereby is continued to
6 October 9, 2018.

7 **No other modifications to the case schedule are authorized and the Court anticipates**
8 **granting no further amendments to the case schedule.**

9
10 IT IS SO ORDERED.

11 Dated: **July 2, 2018**

/s/ Jennifer L. Thurston
UNITED STATES MAGISTRATE JUDGE

12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28 ¹ In future, any stipulation to amend the case schedule SHALL describe the discovery that has not been completed and an explanation why it has not been completed.