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Attorneys for Plaintiffs
DANA SMITHEE, E.M.,
a minor by and through guardian
ad litem JENNIFER MONTES

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

DANA SMITHEE, "E.M.", a minor, by and
through her guardian ad litem, JENNIFER
MONTES,

Plaintiffs,

vs.

RHONDA LITT-STONER, PRATAP
NARAYAN, M.D., JENNIFER SEYMOUR,
KARIN CELOSSE,

Defendants.

) Case No. 1:19-cv-0004 NONE JLT

)
) **SECOND STIPULATION AND**
) **PROPOSED ORDER TO KEEP**
) **DISCOVERY OPEN FOR LIMITED**
) **PURPOSE**

**SECOND STIPULATION AND PROPOSED ORDER TO KEEP DISCOVERY OPEN FOR LIMITED
PURPOSE:** Case No. 1:19-cv-0004 NONE JLT

1 Plaintiffs DANA SMITHEE, "E.M.", a minor, by and through her guardian ad litem,
2 JENNIFER MONTES and Defendant KARIN CELOSSE, by and through their respective attorneys,
3 jointly stipulate to the following:

- 4 1) Following the deposition of Defendant KARIN CELOSSE, taken October 6, 2021,
5 Plaintiffs have determined they may dismiss Defendant CELOSSE, and amend their
6 complaint to add a different defendant.
7
8 2) The current discovery cut-off date is October 14, 2021 and plaintiffs' depositions are
9 currently set for October 12, 2021.
10
11 3) To avoid the burden of taking those depositions unnecessarily, the parties hereby
12 stipulate and agree to extend the discovery cut-off date of October 14, 2021 to
13 November 24, 2021, for the limited purpose of taking plaintiffs' depositions. In
14 addition, the deadline to respond to any currently outstanding written discovery
15 requests is extended to November 24, 2021. Fact discovery for any other purpose
16 closes on October 14, 2021, as scheduled.

17 IT IS SO STIPULATED.
18

19 Dated: October 7, 2021

BROD LAW FIRM, P.C.

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22 By: /S/ Gregory J. Brod
GREGORY J. BROD

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24 *Attorneys for Plaintiffs*
25 *DANA SMITHEE, E.M.,*
26 *a minor by and through guardian*
27 *ad litem JENNIFER MONTES*
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1 Dated: October 7, 2021

2 ROB BONTA
3 Attorney General of California
4 JON S. ALLIN
5 Supervising Deputy Attorney General

6 By: /s/ Jeremy Duggan
7 (per authority for electronic signature)
8 JEREMY DUGGAN

9 *Attorneys for Defendant K. Celosse*
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SECOND STIPULATION AND PROPOSED ORDER TO KEEP DISCOVERY OPEN FOR LIMITED PURPOSE: Case No. 1:19-cv-0004 NONE JLT

[Proposed] ORDER

Good cause appearing, the parties' stipulation to keep discovery open for the limited purpose of deposing plaintiffs, and to provide outstanding discovery responses, until November 24, 2021 is approved. Fact discovery for any other purpose closes on October 14, 2021, as scheduled.

IT IS SO ORDERED.

Dated: **October 7, 2021**

/s/ Jennifer L. Thurston
CHIEF UNITED STATES MAGISTRATE JUDGE