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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION

NYLES LAWAYNE WATSON,

Plaintiff,

v.

DENNIS K. SISTO, et al.,

Defendants.

Case No. CIV S-07-1871 LKK KJN P

**STIPULATION TO ESTABLISH
SCHEDULE FOR EXPERT
DISCOVERY AND DISPOSITIVE
PRETRIAL MOTIONS AND
[PROPOSED] ORDER**

WHEREAS, on February 2, 2010, the Court ordered the parties to meet and confer within 30 days of receipt of the Order on Defendants' Motion to Dismiss for purpose of agreeing to a new deadline for dispositive pretrial motions to propose to the Court;

WHEREAS, on March 3, 2011,¹ the Court's Order on Defendant's Motion to Dismiss became final:

Plaintiff Nyles Lawayne Watson and Defendants Dennis K. Sisto, Jason Rohrer, M.D., Richard Tan, M.D., Alvaro C. Traquina, M.D., California Department of Corrections and Rehabilitation, and California State Prison – Solano hereby stipulate by and through counsel to the following deadline for expert discovery and dispositive pretrial motions as follows:

¹ This stipulated date is in error. The court's Findings and Recommendations filed February 14, 2011, became final on March 30, 2011, when adopted by the district judge.

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- 1. Deadline to designate experts April 15, 2011
- 2. Deadline to serve expert reports May 16, 2011
- 3. Deadline to designate rebuttal experts May 31, 2011
- 4. Deadline to serve rebuttal expert reports June 29, 2011
- 5. Close of expert discovery July 14, 2011
- 6. Deadline to file dispositive pretrial motions August 12, 2011

Dated: March 29, 2011

Respectfully submitted,
JONES DAY

By: /s/ Matthew J. Silveira
Matthew J. Silveira

Attorneys for Plaintiff
NYLES LAWAYNE WATSON

Dated: March 29, 2011

Respectfully submitted,

ATTORNEY GENERAL OF THE STATE OF CALIFORNIA

By: /s/ Catherine Woodbridge Guess (as authorized on March 29, 2011)
Catherine Woodbridge Guess, Deputy Attorney General

Attorneys for Defendants
JASON ROHRER, M.D., RICHARD TAN, M.D., DENNIS K. SISTO, ALVARO C. TRAQUINA, M.D., CALIFORNIA DEPARTMENT OF CORRECTIONS AND REHABILITATION, AND CALIFORNIA STATE PRISON - SOLANO

IT IS SO ORDERED.

DATED: March 31, 2011



KENDALL J. NEWMAN STIPULATED DISMISSAL SCHEDULE AND PROPOSED ORDER
UNITED STATES MAGISTRATE JUDGE CIV 5-07-1871 LKK KJN PC