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6 Attorneys for Plaintiffs SHERIE LEMIRE,  
7 GERARD ST. JOVITE, NICOLE ST. JOVITE, THE  
8 ESTATE OF ROBERT ST. JOVITE

9 UNITED STATES DISTRICT COURT  
10 EASTERN DISTRICT OF CALIFORNIA  
11 SACRAMENTO DIVISION

12 SHERIE LEMIRE, et. al.,

13  
14 Plaintiffs,

15  
16 v.

17  
18 CALIFORNIA DEPARTMENT OF  
19 CORRECTIONS AND  
20 REHABILITATION, et al,

21 Defendants.  
22

**Case No. 2:08-CV-00455-GEB-EFB**

**Stipulation and Proposed Order for  
Extension of Deadlines to File Objections  
to Exhibits, Transcript Counter  
Designations, and Statement of  
Undisputed Facts**

23 The undersigned hereby stipulate to and request extensions of the deadlines for filing  
24 Objections to Exhibits, Transcript Counter Designations, and Statement of Undisputed Facts.  
25 Pursuant to the Court's Order of March 17<sup>th</sup>, 2015, these documents are currently due March  
26 17, 2015.  
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28

1 The parties request that the Court extend the deadline for objections to exhibits,  
2 counter-designations of transcripts, and the statement of undisputed facts to Friday, March 20,  
3 2015 as they are continuing to meet and confer on the undisputed facts, exhibits, and  
4 deposition transcripts to be read. With the additional time, the parties are confident that they  
5 will be able to reach agreement on a number of facts and exhibits which will reduce the  
6 number of objections that will have to be decided by the Court. In addition, the extra time  
7 will allow the parties to minimize the objections to the deposition designations as well as with  
8 the an enlarged set of undisputed facts the amount of testimony to be read to the jury will be  
9 minimized  
10  
11

12 The court has granted one previous extension of this deadline to today.

13 The parties have completed other pretrial filings and are commencing apace with trial  
14 preparation.  
15

16 IT IS SO STIPULATED.

17 March 9, 2015

Respectfully submitted,

18 LAW OFFICES OF GREEN & GREEN, LLP

19 /s/ Geri Lynn Green

20 Geri Lynn Green

21 Attorneys for Plaintiff

22 Dated: March 9, 2015

KAMALA D. HARRIS

Attorney General of California

CHRISTOPHER J. BECKER

Supervising Deputy Attorney General

25 /s/ Diana Esquivel

26 Diana Esquivel

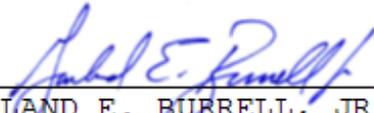
27 Deputy Attorney General

28 Attorneys for Defendants

**O R D E R**

The parties' stipulated request for extension of the deadline for transcript counter-designations, objections to exhibits, and statement of undisputed facts to March 20, 2015, is granted.

Dated: March 19, 2015

  
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GARLAND E. BURRELL, JR.  
Senior United States District Judge

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