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14 Attorneys for Defendants
SISKIYOU COUNTY, SISKIYOU COUNTY PLANNING
15 COMMISSION, LAVADA ERICKSON, FRANK DEMARCO,
DON LANGFORD, BILL HOY, MARCIA ARMSTRONG, JIM
16 COOK, RON STEVENS, JEFF FOWLE, CHRIS LAZARIS,
MIKE MCMAHON, BRIAN MCDERMOTT, LARRY ALLEN,
17 AND PETE KNOLL

18 UNITED STATES DISTRICT COURT
19 EASTERN DISTRICT OF CALIFORNIA

20 STANLEY SWENSON, an individual,

CASE NO.: 2:08-CV-1675 JAM CMK PS

21 Plaintiff,

22 v.

**STIPULATION TO RESET EXPERT
DISCLOSURE DATES AND DISCOVERY
CUT-OFF; (PROPOSED) ORDER**

23 SISKIYOU COUNTY, et al.,

24 Defendants.
25 _____/

1 Plaintiff Stanley Swenson and defendants Siskiyou County, Siskiyou County Planning
2 Commission, Lavada Erickson, Frank Demarco, Don Langford, Bill Hoy, Marcia Armstrong, Jim
3 Cook, Ron Stevens, Jeff Fowle, Chris Lazaris, Mike McMahon, and Brian McDermott
4 (collectively “the Parties”), by and through their respective counsel, hereby stipulate and agree as
5 follows:

6 WHEREAS the Court’s Status (Pre-Trial Scheduling) Order (Document 154) set (1) the
7 last day to exchange expert witness disclosures under Federal Rules of Civil Procedure, Rule
8 26(a)(2) by December 13, 2013; and (2) the last day to exchange supplemental disclosure and
9 disclosure of rebuttal experts under Federal Rules of Civil Procedure, Rule 26(a)(2)(c) by
10 December 20, 2013.

11 WHEREAS the Court’s Status (Pre-Trial Scheduling) Order (Document 154) set February
12 14, 2014 as the deadline to complete all discovery, including written and deposition discovery.

13 WHEREAS the Parties met and conferred about extending these dates in order to permit
14 an orderly completion of expert and percipient discovery, and thus wish to extend the deadlines
15 for expert witness disclosures and certain other discovery.

16 WHEREAS the Parties have completed expert disclosure in December 2013 and January
17 2013, but neglected to seek Court approval in advance of moving these dates, and now
18 respectfully request that this Court confirm the revised schedule.

19 WHEREAS the Parties wish to move the deadline to complete certain percipient witness
20 depositions and expert depositions to March 14, 2014.

21 WHEREAS, the Parties wish to extend defendants time to respond to currently
22 outstanding written discovery by two days, to February 14, 2014.

23 WHEREAS, these extensions will not impact the ability of the Parties to timely complete
24 discovery, including expert discovery in this matter, and comply with the other deadlines set by
25 the Court in the Pretrial Scheduling Order, including the Pretrial Conference and the Trial.

26 The Parties stipulate and agree as follows:

27 1. Regarding Expert Disclosures: Plaintiff shall disclose experts no later than
28 December 19, 2013 (done). Defendants shall disclose experts no later than January 10, 2014
(done). The Parties shall make supplemental expert disclosures no later than January 30, 2014.

2. Regarding the Discovery Cut Off: The parties agree to complete certain percipient witness depositions and expert depositions by March 14, 2014. In this regard, the parties agree to serve notices for all remaining depositions, including those of experts, after meeting and conferring on the dates and places thereof, no later than February 14, 2014.

3. Outstanding Written Discovery: The time for defendants to respond to the written discovery served (by mail) on them on January 10, 2014, and otherwise due on February 12, 2014, shall be extended to February 14, 2014.

SO STIPULATED.

Dated: January 30, 2014

CANNATA, CHING & O'TOOLE LLP

/s/ Therese Y. Cannata

THERESE Y. CANNATA

Attorneys for plaintiff Stanley Swenson

Dated: January 30, 2014

PRICE & BROWN

/s/ Philip B. Price

PHILIP B. PRICE

Attorneys for defendants Siskiyou County, Siskiyou County Planning Commission, LaVada Erickson, Frank Demarco, Don Langford, Bill Hoy, Marcia Armstrong, Jim Cook, Ron Stevens, Jeff Fowle, Chris Lazaris, Mike McMahon, Brian McDermott, Larry Allen and Pete Knoll

ORDER APPROVING STIPULATION

FOR GOOD CAUSE APPEARING, IT IS HEREBY ORDERED that the terms set forth in the above Stipulation are confirmed by this Court.

DATED: 1/30/2014

/s/ John A. Mendez

Honorable John A. Mendez

Judge of the United States

District Court, Eastern District of California