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21 **UNITED STATES DISTRICT COURT**
 22 **EASTERN DISTRICT OF CALIFORNIA**

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24 **ETHAN BLANKENSHIP,**
 25 **Plaintiff,**
 26 **v.**
 27 **ALASKA AIRLINES, INC., and Alaska**
 28 **Corporation, and DOES 1 through 100,**
inclusive,
Defendants.

Case No.: 2:09-CV-01377 JAM GGH

The Hon. John A. Mendez

**STIPULATION TO EXTEND DATES FOR
 EXPERT WITNESS DISCLOSURES AND
 REPORTS; ORDER**

IT IS HEREBY STIPULATED by and between Plaintiff ETHAN BLANKENSHIP and Defendant ALASKA AIRLINES, INC., through their respective counsel to extend the date for Exchange of Initial Expert Witness Disclosure and Reports, currently set for January 15, 2010, to March 19, 2010 and the date for Rebuttal Expert Disclosure currently set for February 12, 2010, to April 16, 2010.

STIPULATION TO EXTEND DATES FOR EXPERT WITNESS DISCLOSURE AND REPORTS; ORDER

1 This stipulation is made by counsel for the parties, pursuant to the Honorable Judge
2 John A. Mendez's Pre-Trial Scheduling Order of July 14, 2009 and U.S.D.C. Eastern
3 District Local Rules, Rule 6-144.

4 There is good cause for the requested extensions of the current dates for expert
5 witness disclosures. Although considerable discovery has been completed to date, a
6 substantial amount of discovery remains in order to compile the necessary evidence to
7 enable prospective experts to formulate their opinions.

8 Plaintiff's action is for damages resulting from a fall in the security area of
9 Sacramento International Airport. Plaintiff and Defendant have each served initial
10 Requests for Production and Requests for Admissions, and Defendant has served
11 Interrogatories. Additionally, depositions have been taken of the Plaintiff and of witnesses
12 who were in Plaintiff's traveling party.

13 Plaintiff's counsel have requested dates for the depositions of Defendant Alaska
14 Airlines, Inc.'s personnel. Plaintiff's medical records have been subpoenaed.

15 Although counsel have not been dilatory in conducting discovery, additional
16 discovery is needed in order to assemble the evidence necessary for prospective experts to
17 formulate their opinions. Such discovery includes, but is not necessarily limited to,
18 depositions of Defendant Alaska Airlines, Inc. personnel, airport security personnel, and
19 treating physicians, and inspection of the area where the fall occurred, as well as further
20 interrogatories and requests for production.

21 The parties agree that each party should be allowed adequate time to conduct
22 necessary discovery into the matters at issue in this action, prior to expending the time and
23 cost which would be required to meet the current expert witness disclosure requirements.
24 The stipulated extension would allow the time needed.

25 Both parties, through their respective counsel, have agreed that it would serve the
26 interests of justice and judicial economy to extend the current expert disclosure dates to
27 March 19, 2010 and April 16, 2010, as set forth above.

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1 The requested extension of the current dates for expert witness disclosure would not
2 affect the other dates set forth in the July 14, 2009 Pre-Trial Scheduling Order.

3 WHEREFORE, the parties respectfully move this Honorable Court to extend the
4 dates for expert witness disclosure as requested herein.

5 Date: January _____, 2010

LAW OFFICES OF CHRISTOPHER E. GRELL

6
7 By: _____

8 RICHARD F. RESCHO

Attorneys for Plaintiff

9 ETHAN BLANKENSHIP

10 Date: January _____, 2010

CAULFIELD, DAVIES & DONAHUE, LLP

11
12 By: _____

13 ROBERT E. DAVIES

MARY A. STEWART

Attorneys for Defendant

14 ALASKA AIRLINES, INC.
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16 **ORDER EXTENDING DATES FOR EXPERT WITNESS DISCLOSURE**

17 IT IS HEREBY ORDERED, good cause appearing therefor, that the date for
18 exchange of Initial Expert Witness Disclosure and Reports, currently set for January 15,
19 2010 is extended through March 19, 2010, and the date for exchange of Rebuttal Expert
20 Witness Disclosure, currently set for February 12, 2010, is extended through April 16, 2010.

21 IT IS SO ORDERED.

22 Date: January 7, 2010

/s/ John A. Mendez _____

23 THE HON. JOHN A. MENDEZ

24 United States District Court Judge
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