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8 Attorneys for Defendant,
 9 PETER DIETRICH

10 **IN THE UNITED STATES DISTRICT COURT**
 11 **IN AND FOR THE EASTERN DISTRICT OF CALIFORNIA**

12 Estate of BALJIT SINGH, deceased, by and
 13 through PRABJIT SINGH DHANDA, JASJIT
 14 KAUR DHANDA, SUKHJIT KAUR
 15 DHANDA and DAVANJIT SINGH
 16 DHANDA (minors through their mother and
 17 guardian ad litem Amarjit Singh) and
 18 AMARJIT SINGH as successors in interest;
 19 PRABJIT SINGH DHANDA, Individually;
 20 JASJIT KAUR DHANDA, Individually,
 21 DAVANJIT SINGH DHANDA, Individually;
 22 and AMARJIT SINGH, Individually,

23 Plaintiffs,

24 vs.

25 COUNTY OF SACRAMENTO, Sacramento
 26 County Sheriff JOHN MCGINNESS;
 27 Sacramento County Main Jail Commander
 28 SCOTT JONES; Sacramento County Sheriff's
 Department Chief of Correctional and Court
 Services JAMIE LEWIS; Sacramento County
 Chief of Correctional Health Services
 ANNMARIE BOYLAN; Sacramento County
 Jail System Medical Director DR. PETER
 DIETRICH; UC Davis Department of
 Psychiatry Chair DR. ROBERT HALES;
 Clinical Director of Jail Psychiatric Services
 PAUL HENDRICKS; Medical Director of Jail
 Psychiatric Services DR. GREGORY
 SOKOLOV; L. MICHAEL TOMPKINS;
 DONNA L. CHAMPEAUL; and DOES 1 to
 40,

Defendants. /

CASE NO.: 2:09-cv-01439 JAM JFM

STIPULATION AND ORDER FOR
 EXTENSION OF TIME FOR DEFENDANT
 DIETRICH TO DISCLOSE EXPERT
 WITNESSES

1 **COME NOW THE PARTIES** by and through their respective attorneys, hereby stipulate
2 to a three week extension for Defendant Dietrich to disclose his expert witnesses. The due date for
3 Defendant Dietrich to disclose his expert witnesses is now May 18, 2012.

4
5 **IT IS SO STIPULATED.**

6 Dated: April 30, 2012

RIVERA & ASSOCIATES

7
8 /s/ Jesse M. Rivera
9 JESSE M. RIVERA
 Attorney for Defendant DIETRICH

10 Dated:

LAW OFF OF STEWART KATZ

11 /s/ Stewart Katz
12 STEWART KATZ
 Attorney for Plaintiffs

13 Dated:

LAW OFFICE OF JOSEPH C. GEORGE

14 /s/ Joseph C. George
15 JOSEPH C. GEORGE
16 Attorney for Plaintiffs

17 Dated:

LONGYEAR, O'DEA & LAVRA, LLP

18 /s/ Van Longyear
19 VAN LONGYEAR
20 JENNIFER MARQUEZ
 Attorneys for Defendants
 County of Sacramento, John Mc Guinness,
21 Scott Jones, Jamie Lewis, Ann Marie Boylan

22 Dated:

23 WILKE, FLEURY, HOFFELT, GOULD &
 BIRNEY, LLP

24 /s/ Robert F. Tyler
25 ROBERT F. TYLER
26 Attorneys for Defendants
 Robert Hayles, Paul Hendricks,
 Gregory Sokolov, L. Michael Tompkins

1 **I, JESSE M. RIVERA HEREBY DECLARE AS FOLLOWS:**

- 2 1. That I am the Attorney of Record for Defendant, DR. PETER DIETRICH, in the
3 above entitled matter;
- 4 2. That I am licensed to practice in all of the courts of the State of California and am
5 also authorized to practice in the Federal District Court, Eastern District, State of
6 California, as well as the Northern and Central District, State of California. I am also
7 authorized to practice in the Ninth and the Eleventh Circuit District Court and the
8 United States Supreme Court;
- 9 3. That I have been retained by the County of Sacramento and County Risk
10 Management to represent the interests of Dr. Peter Dietrich in the above referenced
11 matter;
- 12 4. That Dr. Dietrich was the former Medical Director of the Sacramento County Jail,
13 Health Services;
- 14 5. Since the conclusion of discovery on this case on February 28, 2012, Mr. Katz and
15 myself had been discussing resolving the portion of the case involving my client, Dr.
16 Peter Dietrich.
- 17 6. On April 16, 2012 Mr. Katz called my office and we spoke. He advised me he would
18 be prepared resolve the case against my client;
- 19 7. I spoke to risk management regarding the settlement offer, who is in charge of
20 handling all settlements for the County and their employees. They advised me they
21 would accept said offer;
- 22 8. On April 19, 2012 I communicated the acceptance of this offer to Mr. Katz, both by
23 leaving a message at his office and by an e mail accepting his offer. We were
24 awaiting Mr. Katz to file the appropriate dismissal with the court;
- 25 9. Based on our agreement to resolve Dr. Dietrich's portion of the case all experts were
26 advised to discontinue work on the case and to not author any reports;
- 27 10. At approximately 3:45 PM on Friday April 27, 2012 Mr. Katz called me on my cell

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1 phone and advised me he was no longer willing to resolve the case of my client from this
2 litigation;

3 11. At the time I received the call I was out of town and I just returned to my office on
4 April 30, 2012;

5 12. Mr. Katz advised me he understood that expert witness disclosures were due on
6 April 30, 2012 and based on the late notification he is prepared to stipulate and allow
7 counsel for Dr. Dietrich an extension to disclose experts;

8 13. Thus on behalf of Dr. Dietrich counsel is seeking an extension of time of 18 days or
9 up to May 18, 2012 to disclose experts and their reports;

10 14. Counsel will make his experts available for depositions promptly;

11 15. That all counsel in the action are prepared to stipulate to this brief extension.

12 I declare the above to be true under penalty of perjury, except as to the matters stated upon
13 information and belief, and as to those matters I reasonably believe them to be true.

14 Executed this 30th day of April, 2012, in and for the County of Sacramento, California.

15 /s/ Jesse M. Rivera

16 JESSE M. RIVERA
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**IN THE UNITED STATES DISTRICT COURT
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Estate of BALJIT SINGH, deceased, by and through PRABJIT SINGH DHANDA, JASJIT KAUR DHANDA, SUKHJIT KAUR DHANDA and DAVANJIT SINGH DHANDA (minors through their mother and guardian ad litem Amarjit Singh) and AMARJIT SINGH as successors in interest; PRABJIT SINGH DHANDA, Individually; JASJIT KAUR DHANDA, Individually; DAVANJIT SINGH DHANDA, Individually; and AMARJIT SINGH, Individually,

Plaintiffs,

vs.

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Defendants. _____/

CASE NO.: CIV-S-05-2134 MCE CMK P
ORDER FOR EXTENSION OF TIME FOR DEFENDANT DIETRICH TO DISCLOSE EXPERT WITNESSES

