LAW OFFICE OF JOSEPH C. GEORGE LONGYEAR, O'DEA & LAVRA, LLP 1 Van Longyear, SBN 84189 Joseph C. George, Sr., SBN 119231 Jennifer Marquez, SBN 232194 Joseph George, Jr., SBN 200999 2 3620 American River Drive, Suite 230 2431 Capitol Avenue Sacramento, CA 95864 Sacramento, CA 95816 3 Telephone: (916) 974-8500 Telephone: (916) 442-7100 Facsimile: (916) 974-8510 Facsimile: (916) 442-7657 4 Attorneys for Defendants, Attorneys for Plaintiffs 5 County of Sacramento, John McGinness, Scott Jones, Jamie Lewis, AnnMarie Boylan 6 7 LAW OFFICE OF STEWART KATZ RIVERA & ASSOCIATES Jesse M. Rivera, SBN 084259 Stewart Katz, SBN 127425 8 Guy Danilowitz, SBN 257733 2180 Harvard Street, Ste. 310 555 University Avenue, Suite 270 Sacramento, CA 95815 Sacramento, ČA 95825 Telephone: (916) 922-1200 Telephone: (916) 444-5678 Facsimile: (916) 922-1303 Facsimile: (916) 444-3364 10 Attorneys for Defendant, Attorneys for Plaintiffs Peter Dietrich 11 12 WILKE, FLEURY, HOFFELT, GOULD & BIRNEY, LLP 13 Robert F. Tyler, SBN 063055 400 Capitol Mall, 22nd Floor 14 Sacramento, CA 95814 Telephone: (916) 441-2430 15 Facsimile: (916) 442-6664 Attorneys for Defendants, **16** Robert Hales, Paul Hendricks, Gregory Sokolov, and Dr. L. Michael Tompkins **17** 18 UNITED STATES DISTRICT COURT 19 EASTERN DISTRICT OF CALIFORNIA 20 ESTATE OF BALJIT SINGH, deceased, by CASE NO. 2:09-CV- 1439 21 and through PRABJIT SINGH DHANDA, JASJIT KAUR DHANDA, SUKHJIT STIPULATION AND ORDER FOR 22 KAUR DHANDA and DAVANJIT SINGH MODIFICATION OF PRETRIAL DHANDA (minors through their mother and SCHEDULING ORDER [DOCKET NO. 23 guardian ad litem Amarjit Singh) and 95] AMARJIT SINGH as successors in interest; 24 PRABJIT SINGH DHANDA, Individually; JASJIT KAUR DHANDA, Individually; 25 SUKHJIT KAUR DHANDA, Individually; DAVANJIT SINGH DHANDA, 26 Individually; and AMARJIT SINGH, Individually, 27 Plaintiffs, 28

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1	v.		
2	COUNTY OF SACRAMENTO; Sacramento		
3	County Sheriff JOHN MCGINNESS; Sacramento County Main Jail Commander		
4	SCOTT JONES; Sacramento County Sheriff's Department Chief of Correctional		
5	and Court Services JAMIE LEWIS; Sacramento County Chief of Correctional		
6	Health Services ANNMARIE BOYLAN; Sacramento County Jail System Medical		
	Director Dr. PETER DIETRICH; UC Davis		
7	Department of Psychiatry Chair DR. ROBERT HALES; Clinical Direct of Jail		
8	Psychiatric Services PAUL HENDRICKS; Medical Director of Jail Psychiatric Services		
9	DR. GREGORY SOKOLOV; L. MICHAEL TOMPKINS; and Does 1 to 40, inclusive,		
10	Defendants.		
11	Defendants.		
12			
13	COME NOW THE PARTIES by and through their respective counsel and subject to the		
14	approval of this Court, hereby stipulate and respectfully request the following modifications to		
15	this Court's Pretrial Scheduling Order of December 22, 2011 (Doc. No. 95).		
16	The parties propose the following schedule:		
17	• That the expert discovery cut-off date currently set for May 31, 2012 be moved to June		
18	15, 2012.		
19	• That the dispositive motion filing date currently set for July 16, 2012 be moved to July		
20	30, 2012.		
21	That the last day to file and serve an opposition to dispositive motions currently set for		
22	August 6, 2012 be moved to August 20, 2012.		
23	That the last day to file and serve a reply to an opposition to dispositive motions currently.		
24	set for August 20, 2012 be moved to September 6, 2012.		
25	• That the last day to hear dispositive motions currently set for September 5, 2012 at 9:30		
26	a.m. be moved to September 19, 2012 at 9:30 a.m.		
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1	This calendaring modification is requested because the parties are unable to comply with		
2	the May 31, 2012 deadline for expert discovery due to the experts' limited availability and travel		
3	required as three experts are located out of state. The parties agree to extend all deadlines		
4	approximately two weeks to allow the parties sufficient time for deadlines regarding dispositive		
5	motions and to provide the Court sufficient time to review said motions.		
6	IT IS SO STIPULATED.		
7	Dated: May 31, 2012	LAW OFFICE OF STEWART KATZ	
8		By: /s/ Stewart Katz .	
9		STEWART KATZ Attorneys for Plaintiffs	
10			
11	Dated: May 31, 2012	LAW OFFICE OF JOSEPH C. GEORGE	
12		By: <u>/s/ Joe George</u> . JOSEPH C. GEORGE, SR.	
13		Attorneys for Plaintiffs	
14			
15	Dated: May 31, 2012	LONGYEAR, O'DEA & LAVRA, LLP	
16		By: /s/ Van Longyear .	
17		VAN LONGYEAR JENNIFER MARQUEZ	
18		Attorneys for Defendants, County of Sacramento, John McGinness,	
19		Scott Jones, Jamie Lewis, AnnMarie Boylan	
20	Dated: May 31, 2012	RIVERA & ASSOCIATES	
21		By: <u>/s/ Jesse Rivera</u> . JESSE M. RIVERA	
22		Attorneys for Defendant, Peter Dietrich	
23	Dated: May 31, 2012	WILKE, FLEURY, HOFFELT, GOULD & BIRNEY,	
24	Dated. May 31, 2012	LLP	
25		By: <u>/s/ Robert Tyler</u>	
26		<u>.</u>	
27		ROBERT F. TYLER, JR. Attorneys for Defendants,	
28		Robert Hales, Paul Hendricks, Gregory Sokolov, L. Michael Tompkins	

1	IT IS SO ORDERED.	
2	II IS SO ORDERED.	
3	Dated: 6/1/2012	/s/ John A. Mendez
4		/s/ John A. Mendez John A. Mendez United States District Court Judge
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