1 2 3 4 5	LAW OFFICE OF STEWART KATZ Stewart Katz, SBN 127425 Guy Danilowitz, SBN 257733 555 University Avenue, Suite 270 Sacramento, CA 95825 Telephone: (916) 444-5678 Facsimile: (916) 444-3364 Attorneys for Plaintiffs	LAW OFFICE OF JOSEPH C. GEORGE Joseph C. George, Sr., SBN 119231 Joseph George, Jr., SBN 200999 2431 Capitol Avenue Sacramento, CA 95816 Telephone: (916) 442-7100 Facsimile: (916) 442-7657 Attorneys for Plaintiffs
6 7 8 9 10 11 12	LONGYEAR, O'DEA & LAVRA, LLP Van Longyear, SBN 84189 Jennifer Marquez, SBN 232194 3620 American River Drive, Suite 230 Sacramento, CA 95864 Telephone: (916) 974-8500 Facsimile: (916) 974-8510 Attorneys for Defendants, County of Sacramento, John McGinness, Scott Jones, Jamie Lewis, AnnMarie Boylan	MORENO & RIVERA Jesse M. Rivera, SBN 084259 Jonathan B. Paul, SBN 215884 1451 River Park Drive, Suite 145 Sacramento, CA 95815 Telephone: (916) 922-1200 Facsimile: (916) 922-1301 Attorneys for Defendant, Peter Dietrich
13 14 15 16 17 18 19	WILKE, FLEURY, HOFFELT, GOULD & BIRNEY, LLP Robert F. Tyler, SBN 063055 400 Capitol Mall, 22 nd Floor Sacramento, CA 95814 Telephone: (916) 441-2430 Facsimile: (916) 442-6664 Attorneys for Defendants, Robert Hales, Paul Hendricks, Gregory Sokolov, and Dr. L. Michael Tompkins	
20 21 22	UNITED STATES DISTRICT COURT EASTERN DISTRICT OF CALIFORNIA	
23242526	Estate of BALJIT SINGH, et al. Plaintiffs, vs. COUNTY OF SACRAMENTO, et al.,	NO. 2:09-cv-01439-FCD-JFM STIPULATION AND ORDER MODIFYING PRETRIAL SCHEDULING ORDER
27 28	Defendants.	

COME NOW THE PARTIES by and through their respective parties and subject to the approval of this Court, hereby stipulate and respectfully request the following modifications and/or amendments to this Court's Pretrial Scheduling Order of August 31, 2010, regarding the scheduling of this case:

- That the non-expert discovery cut-off date currently set for May 16, 2011 be moved to **August 29, 2011**.
- That the expert witness disclosure cut-off date currently set for July 15, 2011 be moved to **October 28, 2011**.
- That the supplemental expert witness disclosure cut-off date currently set for August 8, 2011 be moved to **November 21, 2011**.
- That the expert discovery cut-off date currently set for October 13, 2011 be moved to **January 26, 2012**.
- That the Dispositive Motion cut-off date currently set for January 27, 2012 be moved to **March 23, 2012**.
- That the Joint Pretrial Statement currently due March 16, 2012 be moved to May 25, 2012.
- That the Final Pretrial Conference currently set for March 23, 2012 at 2:00pm in Courtroom 2 be moved to **June 1, 2012, at 1:30 p.m.**
- That the Trial currently set for June 5, 2012 9:00am in Courtroom 2 be moved to August 14, 2012, at 9:00 a.m.

This calendaring modification is requested because the availability of lead counsel for one of the parties has been affected by the recent death of his mother, as well as the voluminous nature of the relevant records and the breadth of discovery.

In addition, there has been an unexpected roadblock to discovery posed by the Sacramento Superior Court requiring multiple motions, despite the cooperation amongst all of the counsel in this matter, to disclose information which potentially has a significant impact on the value of the case.

1	Dated: April 14, 2011	LAW OFFICE OF STEWART KATZ
2		/s/ Stewart Katz
3		STEWART KATZ, Attorneys for Plaintiffs
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5		
6	Dated: April 14, 2011	LAW OFFICE OF JOSEPH C. GEORGE
7	Duted. April 11, 2011	
8		/s/ Joseph C. George, Sr. JOSEPH C. GEORGE, SR.
9		Attorneys for Plaintiffs
10		
11	Dated: April 14, 2011	LONGYEAR, O'DEA & LAVRA, LLP
12	2 www. 1 - p. 1 1 1 1 1 2 2 1 1	
13		<u>/s/ Van Longyear</u> VAN LONGYEAR
14		Attorneys for Defendants, County of Sacramento, John McGinness,
15		Scott Jones, Jamie Lewis, AnnMarie Boylan
16		
17	Dated: April 14, 2011	MORENO & RIVERA
18	Dated. April 14, 2011	
19		/s/ Jesse M. Rivera JESSE M. RIVERA
20		Attorneys for Defendant,
21		Peter Dietrich
22		
23	Dated: April 14, 2011	WILKE, FLEURY, HOFFELT, GOULD &
24		BIRNEY, LLP
25		/s/ Robert F. Tyler, Jr. ROBERT F. TYLER, JR.
26		Attorneys for Defendants, Robert Hales,
27		Paul Hendricks, Gregory Sokolov, and L. Michael Tompkins
28		r ·

1	IT IS SO ORDERED.	
2		///
3	Dated: April 15, 2011	/ //www
4		FRANK C. DAMRELL, JR. UNITED STATES DISTRICT
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