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 21 Sokolov, and Dr. L. Michael Tompkins

18 **UNITED STATES DISTRICT COURT**
 19 **EASTERN DISTRICT OF CALIFORNIA**

21 ESTATE OF BALJIT SINGH, deceased, by
 22 and through PRABJIT SINGH DHANDA,
 23 JASJIT KAUR DHANDA, SUKHJIT
 24 KAUR DHANDA and DAVANJIT SINGH
 25 DHANDA (minors through their mother and
 26 guardian ad litem Amarjit Singh) and
 27 AMARJIT SINGH as successors in interest;
 28 PRABJIT SINGH DHANDA, Individually;
 JASJIT KAUR DHANDA, Individually;
 SUKHJIT KAUR DHANDA, Individually;
 DAVANJIT SINGH DHANDA,
 Individually; and AMARJIT SINGH,
 Individually,
 Plaintiffs,

CASE NO. 2:09-CV- 1439 FCD JFM
STIPULATION AND ORDER FOR
MODIFICATION OF PRETRIAL
SCHEDULING ORDER [DOCKET NO.
54]

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v.
COUNTY OF SACRAMENTO; Sacramento
County Sheriff JOHN MCGINNESS;
Sacramento County Main Jail Commander
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 Direct of Jail
Psychiatric Services PAUL HENDRICKS;
Medical Director of Jail Psychiatric Services
DR. GREGORY SOKOLOV; L. MICHAEL
TOMPKINS; and Does 1 to 40, inclusive,

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 to this Court's Pretrial Scheduling Order of April 15, 2011 (Doc. 54), regarding the scheduling of this case:

- That the non-expert discovery cut-off date currently set for August 29, 2011 be moved to **November 29, 2011.**
- That the expert witness disclosure cut-off date currently set for October 28, 2011 be moved to **January 30, 2012.**
- That the supplemental expert witness disclosure cut-off date currently set for November 21, 2011 be moved to **February 21, 2012.**
- That the expert discovery cut-off date currently set for January 26, 2012 be moved to **April 26, 2012.**
- That the dispositive motion cut-off date currently set for March 23, 2012 be moved to **June 29, 2012.**

- 1 • That the Joint Pretrial Statement currently due May 25, 2012 be moved to **August 24,**
2 **2012.**
- 3 • That the Final Pretrial Conference currently set for June 1, 2012 at 1:30 p.m. be moved to
4 **August 31, 2012 at 1:30 p.m.**
- 5 • That the Trial date currently set for August 14, 2012 be moved to **November 14, 2012, at**
6 **9:00 a.m.**

7 This calendaring modification is requested because of the limited availability of both
8 plaintiffs' and defense counsel due to trials in other cases, calendaring conflicts regarding same
9 and counsel for the County of Sacramento is in the process of producing thousands of pages of
10 documents that cannot be produced by the close of the current discovery deadline.

11 **IT IS SO STIPULATED.**

12 Dated: July 15, 2011

LAW OFFICE OF STEWART KATZ

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By: /s/ Stewart Katz.
STEWART KATZ
Attorneys for Plaintiffs

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16 Dated: July 15, 2011

LAW OFFICE OF JOSEPH C. GEORGE

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By: /s/ Joe George.
JOSEPH C. GEORGE, SR.
Attorneys for Plaintiffs

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19

20 Dated: July 15, 2011

LONGYEAR, O'DEA & LAVRA, LLP

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By: /s/ Jennifer Marquez.
VAN LONGYEAR
JENNIFER MARQUEZ
Attorneys for Defendants,
County of Sacramento, John McGinness,
Scott Jones, Jamie Lewis, AnnMarie Boylan

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26 Dated: July 15, 2011

RIVERA & ASSOCIATES

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By: /s/ Jesse Rivera.
JESSE M. RIVERA

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Dated: July 15, 2011

Attorneys for Defendant,
Peter Dietrich
WILKE, FLEURY, HOFFELT, GOULD & BIRNEY,
LLP

By: /s/ Robert Tyler
ROBERT F. TYLER, JR.
Attorneys for Defendants,
Robert Hales, Paul Hendricks,
Gregory Sokolov, L. Michael Tompkins

IT IS SO ORDERED.

Dated: July 18, 2011


FRANK C. DAMRELL, JR.
UNITED STATES DISTRICT JUDGE