

1 **LONGYEAR, O'DEA & LAVRA, LLP**  
 Van Longyear, SBN 84189  
 2 Jennifer Marquez, SBN 232194  
 3620 American River Drive, Suite 230  
 3 Sacramento, CA 95864  
 Telephone: (916) 974-8500  
 4 Facsimile: (916) 974-8510  
 Attorneys for Defendants,  
 5 County of Sacramento, John McGinness,  
 Scott Jones, Jamie Lewis, AnnMarie Boylan  
 6

**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

7 **LAW OFFICE OF STEWART KATZ**  
 Stewart Katz, SBN 127425  
 8 Guy Danilowitz, SBN 257733  
 555 University Avenue, Suite 270  
 9 Sacramento, CA 95825  
 Telephone: (916) 444-5678  
 10 Facsimile: (916) 444-3364  
 Attorneys for Plaintiffs  
 11

**RIVERA & ASSOCIATES**  
 Jesse M. Rivera, SBN 084259  
 2180 Harvard Street, Ste. 310  
 Sacramento, CA 95815  
 Telephone: (916) 922-1200  
 Facsimile: (916) 922-1303  
 Attorneys for Defendant,  
 Peter Dietrich

12 **WILKE, FLEURY, HOFFELT, GOULD**  
**& BIRNEY, LLP**  
 13 Robert F. Tyler, SBN 063055  
 400 Capitol Mall, 22<sup>nd</sup> 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  
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18 **UNITED STATES DISTRICT COURT**  
 19 **EASTERN DISTRICT OF CALIFORNIA**  
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21 ESTATE OF BALJIT SINGH, deceased, by  
 and through PRABJIT SINGH DHANDA,  
 22 JASJIT KAUR DHANDA, SUKHJIT  
 KAUR DHANDA and DAVANJIT SINGH  
 23 DHANDA (minors through their mother and  
 guardian ad litem Amarjit Singh) and  
 24 AMARJIT SINGH as successors in interest;  
 PRABJIT SINGH DHANDA, Individually;  
 25 JASJIT KAUR DHANDA, Individually;  
 SUKHJIT KAUR DHANDA, Individually;  
 26 DAVANJIT SINGH DHANDA,  
 Individually; and AMARJIT SINGH,  
 27 Individually,

28 Plaintiffs,

**CASE NO. 2:09-CV- 1439 JAM JFM**

**STIPULATION AND ORDER FOR  
 MODIFICATION OF PRETRIAL  
 SCHEDULING ORDER [DOCKET NO.  
 65]**

**\*AS MODIFIED BY THE COURT**

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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 counsel and subject to the approval of this Court, hereby stipulate and respectfully request the following modifications to this Court's Pretrial Scheduling Order of September 6, 2011 (Doc. No. 65).

The parties propose the following schedule:

- That the non-expert discovery cut-off date currently set for April 26, 2012 be **moved to February 29, 2012.**
- That the expert witness disclosure cut-off date currently set for January 30, 2012 be **moved to April 16, 2012.**
- That the supplemental expert witness disclosure cut-off date currently set for February 21, 2012 be **moved to May 7, 2012.**
- That the expert discovery cut-off date be **moved to May 31, 2012** (there is no expert discovery cut-off date specified in Docket No. 65 other than the general discovery cut-off date of April 26, 2012).
- That the dispositive motion filing date currently set for June 13, 2012 be **moved to July 16, 2012.**

- 1 • That the last day to file and serve an opposition to dispositive motions be set for **August**
- 2 **6, 2012.**
- 3 • That the last day to file and serve a reply to an opposition to dispositive motions be set for
- 4 **August 20, 2012.**
- 5 • That the last day to hear dispositive motions currently set for July 11, 2012 **be moved to**
- 6 **\* September 5, 2012 at 9:30 a.m.**
- 7 • That the Joint Pretrial Statement currently due on August 24, 2012 be **moved to**
- 8 **\* November 2, 2012.**
- 9 • That the Final Pretrial Conference currently set for August 31, 2012 at 11:00 AM be
- 10 **moved to November 9, 2012, at \*10:00 AM.**
- 11 • That the Trial date currently set for November 5, 2012 be **moved to January 14, 2013 at**
- 12 **9:00 a.m.**

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14 This calendaring modification is requested because of the limited availability of both

15 plaintiffs' counsel and defense counsel due to trials in other cases and calendaring conflicts

16 regarding same.

17 **IT IS SO STIPULATED.**

18 Dated: December 21, 2011

19 LAW OFFICE OF STEWART KATZ

20 By: /s/ Stewart Katz

21 STEWART KATZ

Attorneys for Plaintiffs

22 Dated: December 21, 2011

23 LAW OFFICE OF JOSEPH C. GEORGE

24 By: /s/ Joe George

25 JOSEPH C. GEORGE, SR.

26 Attorneys for Plaintiffs

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Dated: December 21, 2011

LONGYEAR, O'DEA & LAVRA, LLP

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

Dated: December 21, 2011

RIVERA & ASSOCIATES

By: /s/ Jesse Rivera  
JESSE M. RIVERA  
Attorneys for Defendant,  
Peter Dietrich

Dated: December 21, 2011

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 \*AS MODIFIED BY THE COURT**

Dated: December 22, 2011

/s/ John A. Mendez  
John A. Mendez  
United States District Judge