

1 ANTHONY T. CASO, No. 88561  
 Law Office of Anthony T. Caso  
 2 8001 Folsom Boulevard, Suite 100  
 Sacramento, California 95826  
 3 Telephone: (916) 386-4432  
 Facsimile: (916) 307-5164  
 4 E-Mail: tom@caso-law.com

5 Attorney for David Blanton

6 LONGYEAR, O’DEA AND LAVRA, LLP  
 John A. Lavra, CSB No. 114533  
 7 Jeri L. Pappone, CSB No. 210104  
 Amy B. Lindsey-Doyle CSB No. 242205  
 8 3620 American River Drive, Suite 230  
 Sacramento, CA 95864  
 9 Telephone: (916) 974-8500

10 Attorneys for Defendants  
 County of Sacramento, Sacramento County Sheriff’s  
 11 Department, Chris Bittle, Donald Bricker, and Kenneth King

12 UNITED STATES DISTRICT COURT  
 13 EASTERN DISTRICT OF CALIFORNIA  
 14

15 DAVID BLANTON,	)	Case No.: 2:09-CV-01832-MCE-KJM
	)	
16 Plaintiff,	)	
	)	<b>STIPULATION AND ORDER TO AMEND</b>
17 v.	)	<b>THE SCHEDULING ORDER</b>
	)	
18 COUNTY OF SACRAMENTO,	)	
19 SACRAMENTO COUNTY SHERIFF’S	)	
DEPARTMENT, CHRIS BITTLE, DONALD	)	
20 BRICKER, KENNETH KING, and	)	
CRYSTAL FISCHER BRADNAX,	)	
21 Defendants.	)	

22  
 23  
 24 Plaintiff and Defendants County of Sacramento (erroneously sued as the Sacramento County  
 25 Sheriff’s Department), Chris Bittle, Donald Bricker and Kenneth King by and through their  
 26 respective counsel hereby stipulate and request changes to the current Status ( Pretrial Scheduling)  
 27 Order. Defendant Crystal Fischer Bradnax was served via substituted service on September 23,  
 28 2010, and has yet to appear in this action.

1 Good cause exists for the modification to permit the Plaintiff to take properly noticed  
2 depositions that due to scheduling conflicts of the parties and their counsel cannot occur until after  
3 the current discovery deadline of August 4. Defendants have already conducted written discovery  
4 and taken the deposition of Plaintiff, thereby completing its intended discovery. Plaintiff has timely  
5 propounded his written discovery and timely noticed certain depositions. Counsel have met and  
6 conferred and in accommodation of the witnesses schedules and the schedules of counsel, the  
7 properly noticed depositions cannot occur until after August 4.

8 In order to facilitate agreement between the parties on the scheduling of remaining  
9 depositions, the parties stipulate to a change in the court's scheduling order as follows:

- 10 1. No new discovery will be propounded after July 5, 2011.
- 11 2. Depositions properly noticed prior to the current discovery deadline of August 4, 2011  
12 may be taken after said deadline to accommodate scheduling conflicts;
- 13 3. The discovery cutoff for obtaining and enforcing discovery motions related to depositions  
14 as identified within paragraph 2 above shall be 60 days following the final deposition.
- 15 4. All other discovery, including any motions related to any written discovery are subject to  
16 the current discovery cut off of August 4, 2011.

17  
18 DATED: June 24, 2011.

19 Respectfully submitted,

20 ANTHONY T. CASO

21  
22 /s/ ANTHONY T. CASO  
23 Attorney for Plaintiff

24 LONGYEAR, O'DEA AND LAVRA, LLP

25 /s JOHN LAVRA  
26 Attorneys for Defendants, County of Sacramento,  
27 Chris Bittle, Donald Bricker, and Kenneth King  
28

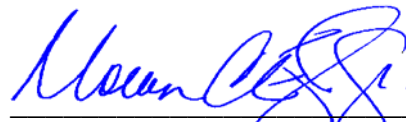
1 **ORDER**

2  
3 Based on the stipulation between the parties, the scheduling order is hereby amended as  
4 follows:

- 5 1. No new discovery will be propounded after July 5, 2011.
- 6 2. Depositions properly noticed prior to the current discovery deadline of August 4, 2011  
7 may be taken up to sixty (60) days following said deadline to accommodate scheduling  
8 conflicts;
- 9 3. The discovery cutoff for obtaining and enforcing discovery motions related to depositions  
10 as identified within paragraph 2 above shall be sixty (60) days following the final deposition.
- 11 4. All other discovery, including any motions related to any written discovery, are subject to  
12 the current discovery cut off of August 4, 2011.

13 IT IS SO ORDERED.

14 DATE: June 28, 2011

15   
16 \_\_\_\_\_  
17 MORRISON C. ENGLAND, JR.  
18 UNITED STATES DISTRICT JUDGE