

1 **LAW OFFICE OF STEWART KATZ**  
 2 Stewart Katz, SBN 127425  
 3 Guy Danilowitz, SBN 257733  
 4 555 University Avenue, Suite 270  
 5 Sacramento, CA 95825  
 6 Telephone: (916) 444-5678  
 7 Facsimile: (916) 444-3364  
 8 Attorneys for Plaintiffs

9 **LONGYEAR, O'DEA & LAVRA, LLP**  
 10 John Lavra, SBN 114533  
 11 Jeri Pappone, SBN 210104  
 12 3620 American River Drive, Suite 230  
 13 Sacramento, CA 95864  
 14 Telephone: (916) 974-8500  
 15 Facsimile: (916) 974-8510  
 16 Attorneys for Defendants,  
 17 County of Sacramento, John McGinness,  
 18 Stephen LeCouve

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

21 DEANNA GANGSTEE and JORDAN  
 22 CHAMBERS  
 23  
 24 Plaintiffs,  
 25  
 26 vs.  
 27  
 28 COUNTY OF SACRAMENTO, et al.,  
 Defendants.

NO. 2:10-CV-01004-KJM-GGH

**STIPULATION AND  
 ORDER MODIFYING PRETRIAL  
 SCHEDULING ORDER**

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 July 7, 2010 Status (Pretrial Scheduling) Order (Docket #13), as modified by the Court's January 5, 2011 Order (Docket #15), regarding the scheduling of this case:

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

- That the non-expert discovery cut-off date currently set for April 17, 2011 be moved to June 17, 2011.
- That the expert witness disclosure cut-off date currently set for May 16, 2011 be moved to July 15, 2011.
- That the supplemental expert witness disclosure cut-off date currently set for June 7, 2011 be moved to August 5, 2011.
- That the expert discovery cut-off date currently set for July 15, 2011 be moved to September 16, 2011.

This calendaring modification is requested because the availability of lead counsel for both parties has been affected by the recent death of the mother of counsel for one of the parties and a serious illness suffered by an immediate family member of counsel for the other party. In addition, Defendants inadvertently provided the wrong documents regarding applicable County policies that are at issue in this case. Defendants are planning on bringing a Motion for Summary Judgment prior to expert disclosure.

Dated: April 12, 2011

LAW OFFICE OF STEWART KATZ  
/s/ Stewart Katz  
STEWART KATZ,  
Attorneys for Plaintiffs

Dated: April 12, 2011

LONGYEAR, O’DEA & LAVRA, LLP  
/s/ John Lavra  
JOHN LAVRA  
Attorneys for Defendants,  
County of Sacramento, John McGinness,  
Stephen LeCouve

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**IT IS SO ORDERED.**

Dated: April 14, 2011.

  
UNITED STATES DISTRICT JUDGE