

1 Alicia J. Donahue (SBN 117412)
 2 adonahue@shb.com
 3 Amir Nassihi (SBN 235936)
 4 anassihi@shb.com
 5 Andrew L. Chang (SBN 222309)
 6 achang@shb.com
 7 SHOOK, HARDY & BACON L.L.P.
 8 One Montgomery, Suite 2700
 9 San Francisco, California 94104
 10 Telephone: (415) 544-1900
 11 Facsimile: (415) 391-0281

12 *Attorneys for Plaintiff*
 13 Ronnie E. Barron

14 KAMALA D. HARRIS, State Bar No. 146672
 15 Attorney General of California
 16 CHRISTOPHER J. BECKER, State Bar No. 230529
 17 Supervising Deputy Attorney General
 18 DIANA ESQUIVEL, State Bar No. 202954
 19 Deputy Attorney General
 20 1300 I Street, Suite 125
 21 P.O. Box 944255
 22 Sacramento, CA 94244-2550
 23 Telephone: (916) 445-4928
 24 Fax: (916) 324-5205
 25 E-mail: Diana.Esquivel@doj.ca.gov

26 *Attorneys for Defendants*
 27 *Todd and Martinez*

28 UNITED STATES DISTRICT COURT
 EASTERN DISTRICT OF CALIFORNIA
 SACRAMENTO DIVISION

RONNIE E. BARRON,

Plaintiff,

v.

M. MARTEL, et al.,

Defendants.

Case No. 2:10-CV-01567-WBS-EFB (TEMP)

**STIPULATION AND ORDER TO EXTEND
 EXPERT DISCOVERY DEADLINES**

Complaint Filed: June 22, 2010

1 Plaintiff Ronnie E. Barron (“Plaintiff”) and Defendants K. Martinez and K. Todd
2 (“Defendants”), by and through their attorneys of record, hereby stipulate to extend the deadlines set
3 by the Court in its Scheduling Order dated June 29, 2015. This stipulation shall not affect the pre-
4 trial conference and trial dates.

5 Good cause exists because Plaintiff’s counsel will be seeking to withdraw as counsel because
6 of a fundamental disagreement on the scope, nature and direction of this case, including the next
7 steps in prosecuting this action. Accordingly, counsel for Plaintiff will be seeking leave to withdraw
8 as counsel of record. Thus, although Plaintiff and his counsel have been diligently working on
9 efforts to prosecute this action, Plaintiff will require additional time to proceed on a pro se basis or
10 secure counsel and engage in expert discovery so that Plaintiff may adequately prepare this case for
11 trial, if necessary.

12 Based on the foregoing, the parties stipulate to the following continuances:

- 13 1. The deadline to serve expert witness disclosures shall be extended from April 14, 2016 to
14 **May 13, 2016.**
- 15 2. The deadline to serve rebuttal expert witness disclosures shall be extended from June 1,
16 2016 to **June 13, 2016.**
- 17 3. The deadline to complete all expert discovery, including depositions of expert witnesses,
18 shall be extended from July 1, 2016 to **July 29, 2016.**

19 Dated: April 11, 2016

Respectfully submitted,

21 SHOOK, HARDY & BACON L.L.P.

22 _____
23 /s/
Alicia J. Donahue
24 Amir Nassihi
Andrew L. Chang

25 Attorneys for Plaintiff
26 *Ronnie E. Barron*
27
28

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

KAMALA D. HARRIS
Attorney General of California
DAVID A. CARRASCO
Supervising Deputy Attorney General

 /s/
DIANA ESQUIVEL
Deputy Attorney General
Attorneys for Defendants Todd and Martinez

ORDER

WHEREAS, good cause exists for the relief requested herein, the Court hereby makes the foregoing Stipulation the Order of this Court.

IT IS SO ORDERED.

DATED: April 13, 2016.


EDMUND F. BRENNAN
UNITED STATES MAGISTRATE JUDGE