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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**

Plaintiff Ronnie E. Barron (“Plaintiff”) and Defendants K. Martinez and K. Todd (“Defendants”), by and through their attorneys of record, hereby stipulate to extend the expert disclosure and discovery deadlines. This stipulation shall not affect the pre-trial conference and trial dates.

Good cause exists because Plaintiff’s counsel has sought to withdraw as counsel because of a fundamental disagreement on the scope, nature and direction of this case, including the next steps in prosecuting this action. Thus, although Plaintiff and his counsel have been diligently working on efforts to prosecute this action, in the event that Plaintiff’s counsel’s Motion to Withdraw is granted,

1 Plaintiff will require additional time to proceed on a pro se basis or secure counsel and engage in  
2 expert discovery so that Plaintiff may continue to prepare this case for trial, if necessary.

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

- 5 1. The deadline to serve expert witness disclosures shall be extended from May 13, 2016 to  
6 **May 27, 2016.**
- 7 2. The deadline to serve rebuttal expert witness disclosures shall be extended from June 13,  
8 2016 to **June 20, 2016.**
- 9 3. The deadline to complete all expert discovery, including depositions of expert witnesses,  
10 shall be extended from July 29, 2016 to **August 5, 2016.**

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12 Dated: May 5, 2016

Respectfully submitted,

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

14 \_\_\_\_\_  
15 /s/  
16 Alicia J. Donahue  
17 Amir Nassihi  
18 Andrew L. Chang

Attorneys for Plaintiff  
*Ronnie E. Barron*

19 KAMALA D. HARRIS  
20 Attorney General of California  
21 CHRISTOPHER J. BECKER  
22 Supervising Deputy Attorney General

23 \_\_\_\_\_  
24 /s/  
25 DIANA ESQUIVEL  
26 Deputy Attorney General  
27 *Attorneys for Defendants Todd and Martinez*  
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**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: May 6, 2016.

  
EDMUND F. BRENNAN  
UNITED STATES MAGISTRATE JUDGE