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10 Attorneys for Plaintiffs

11 **UNITED STATES DISTRICT COURT**  
 12 **EASTERN DISTRICT OF CALIFORNIA**

13 JERRY LUM, individually and as successor  
 14 in interest to JEREMY LUM; DOROTHEA  
 TIMMONS, individually and as successor in  
 15 interest to JEREMY LUM  
 Plaintiffs,

17 v.

18 COUNTY OF SAN JOAQUIN; CITY OF  
 LATHROP; SERGEANT RAY WALTERS;  
 19 SERGEANT STEVEN PEASE; DEPUTY  
 DAVIS; OFFICER FELIPE MENDOZA and  
 20 DOES 1 through 50, inclusive,  
 21 Defendants.

Case No. 2:10-CV-01807-LKK-DAD

**STIPULATION AND ORDER**  
**EXTENDING EXPERT FRCP 26(a)(2)**  
**REPORTS, DISCLOSURES AND**  
**DISCOVERY DEADLINES**

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1           The current deadline for the filing of Expert FRCP 26 reports and disclosures, in the  
2 above-referenced matter, is November 1, 2011. The parties have been working diligently on  
3 preparing this case for trial; they began propounding discovery in February 2011 and attempting  
4 to schedule depositions in July 2011. Thus far nine depositions have been completed and over  
5 1,000 pages of discovery documents exchanged.  
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7           WHEREAS due to scheduling conflicts between witnesses, the parties and their counsel,  
8 certain deposition testimony and documents important for an expert to consider did not come to  
9 light until recently; and  
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11           WHEREAS the parties are working on resolving several discovery disputes that may  
12 affect both the necessity for certain expert disclosures and reports, and the substantive content of  
13 other experts' reports, and;

14           WHEREAS the parties wish to provide more meaningful and comprehensive reports  
15 pursuant to FRCP 26, in line with the goals of this Court and the purpose of these documents,  
16 and;  
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18           WHEREAS a one-month extension of the Expert FRCP 26 Reports and Disclosures and  
19 Discovery Deadlines would in no way affect this Court's Scheduling Order with respect to the  
20 law & motion deadline, the pretrial conference or the trial date,

21           IT IS HEREBY STIPULATED by and between the parties:

22           That the FRCP 26 expert disclosure and reports deadline, currently set for November 1,  
23 2011, shall be extended until November 30, 2011;  
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25           That the discovery motion hearing deadline, currently set for November 30, 2011, shall be  
26 extended until December 31, 2011; and  
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1 That the discovery cut-off, currently set for December 31, 2011 shall be extended until  
2 January 31, 2012.

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4 The parties request that the law & motion deadline, the pretrial conference and trial date  
5 remain as currently scheduled: February 29, 2012, May 29, 2012 and August 28, 2012,  
6 respectively.

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8 DATED: October 26, 2011

WALKER, HAMILTON & KOENIG LLP

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11 By: /s/ Rana Ansari-Jaberi

Attorneys for plaintiffs

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13 DATED: October 26, 2011

THE SUNTAG LAW FIRM P.C.


14  
15 By: /s/Dana Suntag

Attorneys for Defendants

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18 IT IS HEREBY ORDERED that the Scheduling Order be modified as follows:

	<u>Current</u>	<u>New</u>
<b>Expert Disclosure/Report Deadline:</b>	November 1, 2011	November 30, 2011
<b>Discovery Motion Hearing Deadline:</b>	November 30, 2011	December 31, 2011
<b>Discovery Cut-Off:</b>	December 31, 2011	January 31, 2012

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24 DATED: October 31, 2011.

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27 LAWRENCE K. KARLTON  
28 SENIOR JUDGE  
UNITED STATES DISTRICT COURT

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**CERTIFICATE OF SERVICE**  
*Willis, et al. v. City of Fresno, et al.*  
Case No. 1:09 CV 01766 LJO DLB

My business address is 50 Francisco Street, Suite 460, San Francisco, California 94133. I am employed in the County of San Francisco, where this mailing occurs. I am over the age of 18 years and not a party to the within cause.

I declare that on the date hereof, I served a copy of the following documents using the CM/ECF system which will send notifications of such filing to the parties denoted on the Electronic Mail Notice List, and I placed a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid, addressed to the non-CM/ECF participants indicated on the Manual Notice List, for collection and mailing by the U.S. Postal Service in accordance with Walker, Hamilton & Koenig’s ordinary business practices.

**STIPULATION AND PROPOSED ORDER EXTENDING EXPERT FRCP 26(a)(2) REPORTS, DISCLOSURES AND DISCOVERY DEADLINES**

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this declaration was executed on **October 31, 2011**, at San Francisco, California.

/s/Rana Ansari-Jaberi  
\_\_\_\_\_  
RANA ANSARI-JABERI