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7 *Attorneys for Thomas John Heilman*

8 **UNITED STATES DISTRICT COURT**
 9 **EASTERN DISTRICT OF CALIFORNIA**
 10 **SACRAMENTO DIVISION**

11 THOMAS JOHN HEILMAN,
 12 Plaintiff,
 13 v.
 14 C. CHERNISS, et al.,
 15 Defendants.

Case No. 2:11-cv-00042-JAM-EFB

**STIPULATION AND [~~PROPOSED~~]
 ORDER REGARDING SCHEDULE FOR
 EXPERT DISCOVERY**

18 In accordance with this Court’s Order (Dkt. No. 218), Plaintiff Thomas Heilman
 19 (“Plaintiff”) and Defendants Christopher Cherniss and Larry Lesane (“Defendants”) have
 20 conferred regarding a schedule for expert discovery. While the parties are not certain that expert
 21 discovery will be required, the parties stipulate, subject to the Court’s approval, to the following
 22 schedule for expert discovery:

- 23 (1) May 1, 2018 — Disclosure of Expert Witnesses
- 24 (2) May 24, 2018 — Disclosure of Initial Expert Reports
- 25 (3) June 14, 2018 — Disclosure of Rebuttal Expert Witnesses and Rebuttal Expert Reports
- 26 (4) June 29, 2018 — Close of Expert Discovery

27 The parties will notify the Court if they subsequently agree that no expert discovery will be
 28 needed.

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DATED: March 8, 2018

Respectfully submitted,

/s/ Sean K. Apple

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/s/ Tyler H. Onitsuka (as authorized on
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[PROPOSED] ORDER

PURSUANT TO THE STIPULATION ABOVE, IT IS SO ORDERED.

DATED: March 12, 2018.



EDMUND F. BRENNAN
United States Magistrate Judge