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6 Susan Kroner RN, Agnes R. Felicano NP, Glayol Sahba, M.D.,
Deputy John Wilson, Richard Bauer, M.D., Deputy Stephanie Jacoby,
Deputy Mark Medeiros, Deputy Mark Iwasa, Shelley Jordan

7 **UNITED STATES DISTRICT COURT**

8 **EASTERN DISTRICT OF CALIFORNIA**

9
10 SANDIPKUMAR TANDEL,

11 Plaintiff,

12 vs.

13 COUNTY OF SACRAMENTO, et al.,

14 Defendants.

CASE NO. 2:11-cv-00353 MCE AC
[Consolidated with 2:09-cv-00842 MCE GGH]

**STIPULATION AND ORDER FOR
EXTENSION OF TIME FOR INITIAL
& SUPPLEMENTAL DISCLOSURE OF
EXPERT WITNESSES AND DEADLINE
FOR EXPERT WITNESS
DEPOSITIONS**

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18 Plaintiff, Sandipkumar Tandel, is represented by Geri Green and Julien Swanson of the
19 Law Offices of Geri Lynn Green, LC and Dennise S. Henderson of the Law Office of Dennise S.
20 Henderson. Defendants, Attorneys for Defendants County of Sacramento, John McGinness, Ann
21 Marie Boylan, Michael Sotak, M.D., Susan Kroner RN, Agnes R. Felicano NP, Glayol Sahba,
22 M.D., Deputy John Wilson, Richard Bauer, M.D., Deputy Stephanie Jacoby, Deputy Mark
23 Medeiros, Deputy Mark Iwasa, and Shelley Jordan ("County of Sacramento, et al.") are
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1 represented by Van Longyear and Peter C. Zilaff of Longyear, O’Dea & Lavra, LLP. Defendant
2 Chris Smith, M.D. is represented by Norman V. Prior of Porter Scott.

3 Good cause exists to modify the pretrial scheduling order to extend the time for the initial
4 disclosure of experts, supplemental experts and discovery and depositions of expert witnesses.
5 The extensive discovery conducted to date has motivated the parties to explore settlement
6 through mediation. Rule 26 expert reports are currently scheduled to be exchanged on or before
7 April 1, 2014. The parties believe that resources might be better devoted to mediation rather
8 than devoted to the preparation of final reports and therefore wish to extend the date to exchange
9 to and including May 15, 2014.

10 The brief extension of time to complete the expert witness disclosures and depositions
11 will allow the parties an opportunity to potentially dispose of the case before expending
12 unnecessary expert witness expenses. Thus, the parties respectfully request an extension for the
13 initial expert disclosure date, the supplemental expert disclosure date and the last date for parties
14 to complete expert discovery and depositions, as follows:

15 Initial disclosure of experts	April 1, 2014 until May 15, 2014
16 Supplemental disclosure of experts	April 21, 2014 until May 28, 2014
17 Expert witness discovery/depositions	May 1, 2014 until June 30, 2014.

18 IT IS SO STIPULATED:

19 Dated: March 18, 2014

LAW OFFICE OF GERI GREEN

20 */S/ Geri Green*

21 GERI GREEN

22 Attorneys for Plaintiff

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Dated: March 18, 2014

PORTER SCOTT

/s/ Norman V. Prior

NORMAN V. PRIOR

Attorneys for Defendant,
Chris Smith, M.D.

Dated: March 18, 2014

LONGYEAR, O'DEA & LAVRA, LLP

/s/ Van Longyear


VAN LONGYEAR

Attorneys for Defendants,
County of Sacramento, et al.

ORDER

IT IS SO ORDERED.

Dated: April 22, 2014



MORRISON C. ENGLAND, JR., CHIEF JUDGE
UNITED STATES DISTRICT COURT