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8 *Attorney for Plaintiffs,*  
9 *Linnie and Melissa Staggs*

10 UNITED STATES DISTRICT COURT  
11 EASTERN DISTRICT OF CALIFORNIA

12 LINNIE STAGGS, individually and as  
13 Administrator of the Estate of Robert E.  
14 Staggs, and MELISSA STAGGS,

15 Plaintiffs,

16 v.

17 DOCTORS HOSPITAL OF MANTECA,  
18 INC. et al.,

19 Defendants.

No. 2:11-cv-00414 MCE-KJN

STIPULATION AND ORDER EXTENDING  
EXPERT DISCLOSURE DEADLINE

20 Pursuant to Local Rules 143 and 144, the parties stipulate and ask the Court to enter an  
21 order extending the expert disclosure deadline in this matter by 4 days, to May 5, 2017.

22 Pursuant to the Scheduling Order, disclosure of expert witnesses is scheduled to take place  
23 by May 1, 2017. ECF No. 145, at 2. This is the first request for an extension of that deadline.

24 Discovery was to have been completed by March 1, 2017. The parties initially agreed on a  
25 date for the deposition of Defendant Dr. Bangi that was during the discovery period. Due to a  
26 combination of factors, including the doctor's health issues, his international travel, and the fact  
27 that he has relocated to Saudi Arabia which necessitated coordinating the rescheduled deposition  
28 dates based on serious time-zone discrepancies, Dr. Bangi's deposition was delayed. The court  
reporter was only able to make the transcript of Dr. Bangi's deposition available to counsel this

1 morning, on April 28, 2017. In order to allow all parties' experts an opportunity to review the  
2 deposition transcript of Dr. Bangi, and incorporate that testimony into their reports, the parties ask  
3 that the deadline for expert disclosures be extended by four days, to May 5, 2017.

4 Dated: April 28, 2017

***/S/ Carter C. White***

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Carter C. White  
6 *Attorney for Plaintiffs*

7 ***/S/ Diana Esquivel***

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Diana Esquivel  
9 *Attorney for Defendants Allen, Bangi,  
Krpan, and St. Clair*

10 ***/S/ Stephanie L. Roundy***

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Stephanie L. Roundy  
12 *Attorney for Defendant  
Mario Sattah, M.D.*

14 ***/S/ Scott A. Ginns***

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16 *Attorney for Defendant  
James P. Owen, M.D.*

17 ***/S/ Carolyn Northrup***

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Carolyn Northrup  
19 *Attorney for Defendant  
Doctors Hospital of Manteca, Inc.*

21 ***/S/ Jason Barnas***

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Jason Barnas  
23 *Attorney for Defendant  
Lincoln Russin, M.D.*

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**ORDER**

Pursuant to the stipulation of the parties and good cause appearing, the deadline for disclosure of expert testimony is extended to May 5, 2017. All other dates in the scheduling order remain unchanged.

IT IS SO ORDERED.

Dated: May 4, 2017

  
MORRISON C. ENGLAND, JR  
UNITED STATES DISTRICT JUDGE