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14 IN THE UNITED STATES DISTRICT COURT
 15 FOR THE EASTERN DISTRICT OF CALIFORNIA
 16 SACRAMENTO DIVISION

18 **LINNIE STAGGS, as Administrator of the**
ESTATE OF ROBERT E. STAGGS,
 19 **deceased, and MELISSA STAGGS,**

20 Plaintiffs,

21 v.

22 **DOCTOR'S HOSPITAL OF MANTECA,**
 23 **INC., et al.,**

24 Defendants.

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

STIPULATED REQUEST FOR 60-DAY
EXTENSION TO DISCLOSE
REBUTTAL EXPERT WITNESS AND
ORDER

Trial Date: None
 Action Filed: June 9, 2011

26 Under Federal Rule of Civil Procedure 6(d)(a) and Local Rules 143 and 144, the parties, by
 27 and through their attorneys of record, stipulate to and request a sixty-day extension of the March
 28

1 27, 2020 deadline for Defendants to disclose their rebuttal expert witness(es) primarily due to the
2 effects of the coronavirus (COVID-19) outbreak.

3 The Court previously extended the deadline for Defendants to disclose rebuttal expert
4 witnesses by thirty-days. (ECF Nos. 284, 285.) Since the last extension, defense counsel, Diana
5 Esquivel, had been pursuing some promising leads to locate the needed expert given that
6 compassionate releases are a specialized niche with the California Department of Corrections and
7 Rehabilitation (CDCR). However, given the events of the past three weeks involving the
8 COVID-19 pandemic, proclamations of a state emergency from state and local officials for
9 residents to shelter-in, and implemented telework schedules for many public agencies, including
10 CDCR, Defendants have not been able to retain a rebuttal expert witness and will not be able to
11 do so by the current deadline. The parties therefore agree to an additional sixty-day extension, up
12 to and including May 29, 2020, for Defendants to disclose their rebuttal expert witness(es). The
13 parties further agree to and request that the Court continue the April 9, 2020 deadline to file the
14 Joint Statement concerning expert-related motions to June 9, 2020.

15 IT IS SO STIPULATED.

16 Dated: March 26, 2020

17 Respectfully submitted,

18 OFFICE OF THE ATTORNEY GENERAL

19 */s/ Diana Esquivel*

20 DIANA ESQUIVEL
21 Deputy Attorney General
22 *Attorneys for Defendants Allen, Bangi, Krpan,
and St. Clair*

23 Dated: March 25, 2020

24 UC DAVIS CIVIL RIGHTS CLINIC

25 */s/ Carter White* (authorized 3/25/2020)

26 CARTER C. WHITE
27 *Attorneys for Plaintiffs Linnie and Melissa
28 Staggs*

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Dated: March 25, 2020

DUMMIT, BUCKHOLZ & TRAPP

/s/ **Carolyn L. Northrop** (authorized 3/25/20)

CAROLYN L. NORTHROP
*Attorneys for Defendants Doctors Hospital of
Manteca, Inc.*

Dated: March 25, 2020

RIGGIO, MORDAUNT & KELLY

/s/ **Stephanie L. Roundy** (authorized 3/25/20)

MICHAEL R. MORDAUNT
STEPHANIE L. ROUNDY
Attorneys for Defendant Mario Sattah, M.D.

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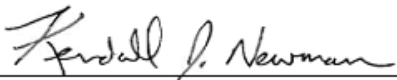
ORDER

Based on the parties' stipulation and good cause appearing, the request to extend the deadline to disclose rebuttal experts by sixty days is GRANTED.

Defendants shall disclose their rebuttal expert(s) to Plaintiffs' damages expert, Daniel Vasquez, by no later than May 29, 2020.

The Joint Statement on whether leave to file any motion will be sought concerning the damages experts is now due by June 9, 2020.

Dated: March 30, 2020


KENDALL J. NEWMAN
UNITED STATES MAGISTRATE JUDGE

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