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

19 **LINNIE STAGGS, as Administrator of the**
20 **ESTATE OF ROBERT E. STAGGS,**
deceased, and MELISSA STAGGS,
21 Plaintiffs,
22
23 v.
24 **DOCTORS HOSPITAL OF MANTECA,**
INC., et al.,
25 Defendants.
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No. 2:11-cv-00414 MCE-KJN

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

Trial Date: None
Action Filed: June 9, 2011

1 Under Federal Rule of Civil Procedure 6(d)(a) and Local Rules 143 and 144, the parties, by
2 and through their attorneys of record, stipulate to and request a fourteen-day extension of the May
3 29, 2020 deadline for Defendants to disclose their rebuttal expert witness(es). This extension is
4 needed due to the unexpected unavailability of the witness the Defendants had secured to serve as
5 a rebuttal expert.

6 Defendants previously requested, and the Court granted, two extensions for Defendants to
7 disclose rebuttal expert witnesses. (ECF Nos. 284-287.) Since the last extension, defense
8 counsel, Diana Esquivel, located an individual in CDCR's Classification Services Unit (CSU)
9 who had knowledge of the compassionate-release process and was willing to serve as a rebuttal
10 witness in this case. To that end, the CSU employee reviewed the relevant case materials, and
11 Defendants were prepared to make a timely disclosure. However, on the morning of May 28,
12 2020, Ms. Esquivel was informed that the CSU employee had become unexpectedly unavailable
13 and would not be able to serve as a rebuttal expert. Ms. Esquivel spoke with several CSU
14 supervisors to find out if another CSU staff member was available to assist in this matter. As of
15 the date of filing this stipulation, Ms. Esquivel continues to work with CSU and other CDCR staff
16 to identify another individual knowledgeable of the compassionate-release process and who is
17 available to serve as a rebuttal expert. For this reason, Defendants require a two-week extension
18 to disclose their rebuttal expert.

19 The parties therefore agree to an additional fourteen-day extension, up to and including
20 June 12, 2020, for Defendants to disclose their rebuttal expert witness(es).

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1 The parties further agree to and request that the Court continue the June 9 deadline to file
2 the Joint Statement concerning expert-related motions to June 19, 2020.

3 IT IS SO STIPULATED.

4 Dated: May 29, 2020

Respectfully submitted,

OFFICE OF THE ATTORNEY GENERAL

7 */s/ Diana Esquivel*

8 DIANA ESQUIVEL
9 Deputy Attorney General
*Attorneys for Defendants Allen, Bangi, Krpan,
and St. Clair*

10 Dated: May 29, 2020

UC DAVIS CIVIL RIGHTS CLINIC

11 */s/ Carter White* (authorized 5/29/2020)

12 CARTER C. WHITE
13 *Attorneys for Plaintiffs Linnie and Melissa
Staggs*

14
15 Dated: May 29, 2020

DUMMIT, BUCKHOLZ & TRAPP

16 */s/ Carolyn L. Northrop* (authorized 5/29/20)

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

19
20 Dated: May 29, 2020

RIGGIO, MORDAUNT & KELLY

21 */s/ Stephanie L. Roundy* (authorized 5/29/20)

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

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ORDER

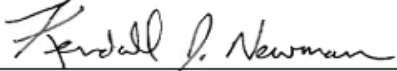
Based on the parties' stipulation and good cause appearing, the request to extend the deadline to disclose rebuttal experts by fourteen days is GRANTED.

Defendants shall disclose their rebuttal expert(s) to Plaintiffs' damages expert, Daniel Vasquez, by no later than June 12, 2020.

The Joint Statement on whether leave to file any motion will be sought concerning the damages experts is now due by June 19, 2020.

IT IS SO ORDERED.

Dated: June 1, 2020


KENDALL J. NEWMAN
UNITED STATES MAGISTRATE JUDGE

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