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14
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.
26

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

STIPULATED REQUEST FOR FOUR-
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 four-day extension of the June 12,
3 2020 deadline for Defendants to disclose their rebuttal expert witness(es). This extension is
4 needed because Defendants' newly identified rebuttal expert requires additional time to review
5 the case material and complete her report.

6 Defendants previously requested, and the Court granted, three extensions for Defendants to
7 disclose rebuttal expert witnesses. (ECF Nos. 284-289.) Defendants' last extension was needed
8 due to the unexpected unavailability of the Classification Services Unit (CSU) employee who had
9 intended to serve as a rebuttal witness in this case. With the assistance of CDCR, Defendants
10 have identified an employee with the Board of Parole Hearings who is willing to serve as an
11 expert. The Board employee has already started working on this matter; but given the amount of
12 material that she must review, she requires a little more time to complete her report. Defendants
13 therefore seek a short extension to June 16 to serve their disclosures.

14 Plaintiffs agree to an additional four-day extension. No other deadline will be affected by
15 this request.

16 IT IS SO STIPULATED.

17
18 Dated: June 11, 2020

Respectfully submitted,

OFFICE OF THE ATTORNEY GENERAL

/s/ Diana Esquivel

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

23 Dated: June 11, 2020

UC DAVIS CIVIL RIGHTS CLINIC

/s/ Carter White (authorized 6/11/2020)

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

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Dated: June 11, 2020

DUMMIT, BUCKHOLZ & TRAPP

/s/ Carolyn L. Northrop (authorized 6/11/20)
CAROLYN L. NORTHROP
*Attorneys for Defendants Doctors Hospital of
Manteca, Inc.*

Dated: June 11, 2020

RIGGIO, MORDAUNT & KELLY

/s/ Stephanie L. Roundy (authorized 6/11/20)
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STEPHANIE L. ROUNDY
Attorneys for Defendant Mario Sattah, M.D.

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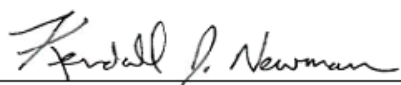
ORDER

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

Defendants shall disclose their rebuttal expert(s) to Plaintiffs' damages expert, Daniel Vasquez, by no later than June 16, 2020.

IT IS SO ORDERED.

Dated: June 12, 2020


KENDALL J. NEWMAN
UNITED STATES MAGISTRATE JUDGE