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 10 ENLOE MEDICAL CENTER

11 UNITED STATES DISTRICT COURT  
 12 EASTERN DISTRICT OF CALIFORNIA  
 13 SACRAMENTO DIVISION

14 RICKIE L CHIPMAN,  
 15 Plaintiff,

16 v.

17 MARCIA F. NELSON, et al.,  
 18 Defendants.

Case No.: 2:11-cv-02770-TLN-EFB

**STIPULATION AND [PROPOSED]  
 ORDER TO EXTEND EXPERT  
 DISCLOSURE AND EXPERT  
 DEPOSITIONS**

Action Filed: October 20, 2011

19 The plaintiff, who is in pro per, and the defendants, who are represented by counsel, and  
 20 pursuant to Local Rules 143 and 144, stipulate as follows:

- 21 1. The Court issued a Scheduling Order on October 20, 2021, namely Document 613.
- 22 2. The Order stated in part as follows:
  - 23 A) The plaintiff shall serve her expert disclosure on or before December 2, 2021;
  - 24 B) The defendants shall serve their expert disclosure on or before December 16, 2021;
  - 25 C) Rebuttal disclosures shall be served on or before January 5, 2022.
  - 26 D) Expert depositions “shall be completed within thirty days of disclosure.”
- 27 3. The Order further stated as follows:  
 28 “The court recognizes that this schedule covers the end of the year  
 holiday period. The court is amenable to granting reasonable  
 extensions if necessary.”

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1           4.    Good cause exists for the Court to extend the disclosure and discovery deadlines. The  
2 good cause includes the fact, as stated by the court, that “this schedule covers the end of the holiday  
3 period.”

4           5.    Further good cause exists because other professional demands upon the attorneys and  
5 expert witnesses, and the requirement under the Federal Rules that written reports be provided by the  
6 experts, make it difficult, if not impossible, to comply with the time limits imposed by the Court in its  
7 order.

8           6.    The other professional demands upon counsel for Enloe Medical Center include trial on  
9 December 6-10, 2021 in *Kass v. County of Alameda*. The case is venued in the Northern District of the  
10 Federal Court, and is considered to be a date certain. There is no possibility of settlement in the case.

11          7.    Additionally, counsel for Dr. Joseph Matthews is scheduled to take a few days of  
12 vacation from October 28 through November 1, and November 12 through November 15, 2021.

13          8.    I sent an email to the plaintiff and codefense counsel on October 21, 2021. It stated the  
14 following in pertinent part:

15                   “The three of us should ask the court to extend the deadline of Ms.  
16 Chipman to February 1, 2022. The deadline for the defendants should  
17 be moved to February 15. The rebuttal disclosure deadline should be  
18 moved to March 4.”

18          9.    The plaintiff responded by email on that same day. Her email stated in pertinent part:

19                   “. . . I hereby confirm and accept your proposal to request an  
20 extension, as you have stated with this proposal [of today] . . .”

21          10.   Counsel for co-defendant Dr. Joseph Matthews responded by email on October 22. His  
22 email stated in pertinent part:

23                   “We agree with Mr. Andrada’s proposal and look forward to receipt  
24 of the joint stipulation for our execution.”

25          11.   Given all of the above, the parties request that the Court change the disclosure dates of  
26 December 2, December 16, and January 5 to the following:

- 27                   a) Plaintiff’s expert disclosure shall be served on or before February 1, 2022;  
28                   b) Defendants’ expert disclosures shall be served on or before February 15, 2022; and

- 1 c) Rebuttal disclosures shall be served on or before March 4, 2022.
- 2 12. Additionally, the Order dated October 20 requires the parties to complete “any expert
- 3 depositions . . . within thirty days of disclosure.” Given all of the above, the parties request that the
- 4 Court issue the following order with regard to the completion of expert depositions:
- 5 a) If any party deposes one or more experts who were disclosed by the plaintiff on or
- 6 before February 1, said deposition(s) must be completed on or before March 3, 2022
- 7 b) If any party deposes one or more experts who were disclosed by one or more
- 8 defendants on or before February 15, 2022, said deposition(s) must be completed on
- 9 or before March 17, 2022.
- 10 c) If any party deposes one or more experts who were disclosed as a rebuttal expert,
- 11 said deposition(s) must be completed on or before April 4, 2022.
- 12 13. The parties respectfully request that the Court extend the dates for expert disclosure and
- 13 expert depositions as set forth above.

14 IT IS SO STIPULATED

16 Dated: October 22, 2021

ANDRADA & ASSOCIATES

17 /s/ J. Randall Andrada

18 By \_\_\_\_\_  
19 J. RANDALL ANDRADA  
Attorneys for Defendant  
ENLOE MEDICAL CENTER

20 I attest that Rickie L. Chipman and Steven M. McKinley have authorized me to file this

21 document with their electronic signatures.

22 /s/ J. Randall Andrada

23 \_\_\_\_\_  
J. RANDALL ANDRADA

24 Date: October 22, 2021

25 /s/ Rickie L. Chipman

26 \_\_\_\_\_  
RICKIE L. CHIPMAN  
27 Plaintiff

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Dated: October 22, 2021

LOW McKINLEY BALERIA &  
SALENKO, LLP

*/s/ Steven M. McKinley*

By \_\_\_\_\_  
STEVEN M. McKINLEY  
Attorneys for Defendant  
JOSEPH M. MATTHEWS

IT IS SO ORDERED.

Dated: October 27, 2021.



\_\_\_\_\_  
EDMUND F. BRENNAN  
UNITED STATES MAGISTRATE JUDGE