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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
 EASTERN DISTRICT OF CALIFORNIA**

15 LILLY MANNING, KENYATA
 16 MANNING, and NATASHA MANNING,
 17 Plaintiffs,

vs.

18 MIKE CROSBY, RACHEL LANE, MARY
 19 STRUHS, NATASHA JOHNSON,
 20 STEPHANIE WHITNEY-COOK,
 21 PAULINE TRACEY, LYNN TRACY,
 22 MSW, SACRAMENTO UNIFIED
 23 SCHOOL DISTRICT, DEPARTMENT OF
 24 HEALTH AND HUMAN SERVICES,
 CHILD PROTECTIVE SERVICES,
 SACRAMENTO COUNTY, and DOES 5
 through 25, inclusive,
 Defendants.

NO. 2:12-CV-01784-TLN-KJN

**STIPULATION AND ORDER TO
 MODIFY PRETRIAL SCHEDULING
 ORDER**

[DATES MODIFIED]

25 Plaintiffs Lilly Manning, Kenyata Manning and Natasha Manning, (collectively referred
 26 to hereinafter as “Plaintiffs”) are represented by Joseph C. George and Joseph C. George, Jr., of
 27 the Law Offices of Joseph C. George, 601 University Avenue, Suite 200, Sacramento,
 28 California 95825, and Stewart Katz of the Law Office of Stewart Katz, 555 University Avenue,

1 #270, Sacramento, California 95825.

2 Defendants County of Sacramento and Lynn Tracy, MSW (collectively referred to
3 hereinafter as “Sacramento County Defendants”) are represented by John A. Lavra and
4 Amanda McDermott of Longyear, O’Dea & Lavra, LLP.

5 Pursuant to Federal Rule of Civil Procedure 16(b)(4), the parties hereby stipulate and
6 request that the Third Amended Pretrial Scheduling Order issued on May 26, 2015 (Docket No.
7 24) be modified to reflect new deadlines as follows, or as to accommodate the Court’s docket:

8	Discovery Deadline:	April 1, 2016
9	Expert Witness Disclosure:	May 27, 2016
10	Dispositive Motion Deadline:	October 13, 2016
11	Joint Final Pretrial Conference Statement:	January 26, 2017
12	Final Pre-trial Conference:	February 2, 2017
13	Trial:	April 3, 2017

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15 **Reasons for this Stipulation/ Request**

16 The parties stipulate to and request this approximate four-month extension of dates for
17 multiple reasons.

18 Allowing the parties to extend the deadlines for approximately four months will save
19 expenses and greatly increase the likelihood of settling this case.

20 In addition, there have been unexpected delays in obtaining state court adoption records
21 which are needed by all parties. On October 27, 2015, Judge Blizzard with Sacramento
22 Superior Court advised parties that the state court had reviewed the adoption records and while
23 the court was able to identify a number of pages in the record that might be relevant, the court
24 felt that it had insufficient background information to determine the relevance or a significant
25 portion of the records and invited the parties to propose an alternative review process. Both
26 parties expect to review the state court adoption records this month. After reviewing the
27 records, additional discovery may need to be conducted. Extending the discovery cut-off date
28 by four months will allow for the potential need of additional discovery.

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Dated: December 1, 2015

LAW OFFICE OF JOSEPH C. GEORGE, PH.D.

By: /s/ Joseph C. George
JOSEPH C. GEORGE
JOSEPH C. GEORGE, JR.
Attorneys for Plaintiffs

Dated: December 1, 2015

LAW OFFICE OF STEWART KATZ

By: /s/ Stewart Katz
STEWART KATZ
Attorneys for Plaintiffs

Dated: December 1, 2015

LONGYEAR, O'DEA & LAVRA, LLP

JOHN LAVRA

By: /s/ John Lavra

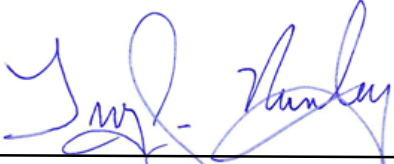
AMANDA MCDERMOTT
Attorneys for Defendants
COUNTY OF SACRAMENTO
and LYNN TRACY, MSW

The Court hereby modifies the Pretrial Scheduling Order as follows:

Discovery Deadline:	April 1, 2016
Expert Witness Disclosure:	May 27, 2016
Dispositive Motion Deadline:	October 20, 2016
Joint Final Pretrial Conference Statement:	February 2, 2017
Final Pre-trial Conference:	February 9, 2017, at 2:00 p.m.
Trial:	April 3, 2017, at 9:00 a.m.

IT IS SO ORDERED.

Dated: December 1, 2015



Troy L. Nunley
United States District Judge