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Attorneys for Plaintiffs

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

LILLY MANNING, KENYATA MANNING,  
and NATASHA MANNING,  
Plaintiffs,

vs.

MIKE CROSBY, RACHEL LANE, MARY  
STRUHS, NATASHA JOHNSON,  
STEPHANIE WHITNEY-COOK, PAULINE  
TRACEY, LYNN TRACY, MSW,  
SACRAMENTO UNIFIED SCHOOL  
DISTRICT, DEPARTMENT OF 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**

1 Plaintiffs Lilly Manning, Kenyata Manning and Natasha Manning, (collectively  
2 referred to hereinafter as “Plaintiffs”) are represented by Joseph C. George and Joseph C.  
3 George, Jr., of the Law Offices of Joseph C. George, 601 University Avenue, Suite 200,  
4 Sacramento, California 95825, and Stewart Katz of the Law Office of Stewart Katz, 555  
5 University Avenue, #270, Sacramento, California 95825.

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

9 Defendants Mike Crosby, Rachel Lane, Mary Struhs, Natasha Johnson, Stephanie  
10 Whitney-Cook, Pauline Tracey and Sacramento Unified School District were dismissed  
11 from this action on August 18, 2015. (ECF 27.)

12 Pursuant to Federal Rule of Civil Procedure 16(b)(4), the parties hereby stipulate and  
13 request that the Scheduling Order issued on December 2, 2015 (ECF 31) be modified to  
14 reflect new deadlines as follows, or as to accommodate the Court’s docket:

15	Discovery Deadline:	May 13, 2016
16	Expert Witness Disclosure:	June 28, 2016
17	Dispositive Motion Deadline:	October 13, 2016*
18	Joint Final Pretrial Conference Statement:	January 26, 2017*
19	Final Pretrial Conference:	February 2, 2017, at 2:00 p.m.*
20	Trial:	April 3, 2017, at 9:00 a.m.*

21 *\*no change to prior scheduling order*  
22

23 The parties stipulate to and request this extension of the discovery and expert witness  
24 disclosure deadlines in order to accommodate the serious health condition of Defendant  
25 Lynn Tracy, which affects her ability to attend and sit for a deposition. The parties have met  
26 and conferred regarding these health concerns. In order to accommodate these concerns, the  
27 parties require additional time to complete Ms. Tracy’s deposition.  
28

1 This is a very complicated and factually intensive case. It has involved extensive  
2 discovery and experienced various unexpected delays. The discovery and expert disclosure  
3 deadlines as currently set would make competent defense or prosecution of this case  
4 impossible. The parties are confident that the new deadlines for discovery and expert  
5 disclosure would provide all parties with adequate time to complete dispositive motions and  
6 have the case prepared for trial by the currently scheduled trial date.

7 **IT IS SO STIPULATED.**

8  
9 Dated: March 31, 2016

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

10 By: /s/ Joseph C. George

11 JOSEPH C. GEORGE

12 JOSEPH C. GEORGE, JR

13 Attorneys for Plaintiffs

14 Dated: March 31, 2016

**LAW OFFICE OF STEWART KATZ**

15 By: /s/ Stewart Katz

16 STEWART KATZ

17 Attorneys for Plaintiffs

18  
19 Dated: March 31, 2016

**LONGYEAR, O'DEA & LAVRA, LLP**

20 By: /s/ Amanda McDermott

21 JOHN LAVRA

22 AMANDA MCDERMOTT

23 Attorneys for Defendants County of Sacramento and  
24 Lynn Tracy, MSW  
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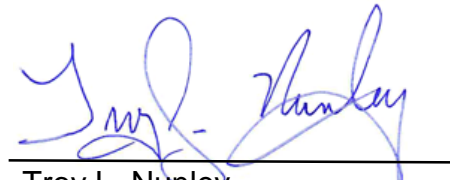
**ORDER**

Good cause appearing, the Court hereby modifies the Pretrial Scheduling Order as follows:

Discovery Deadline:	May 13, 2016
Expert Witness Disclosure:	June 28, 2016
Dispositive Motion <u>Hearing</u> Deadline:	<b>November 3, 2016</b>
Joint Final Pretrial Conference Statement:	<b>February 2, 2017</b>
Final Pretrial Conference:	<b>February 9, 2017, at 2:00 p.m.</b>
Trial:	<b>April 3, 2017, at 9:00 a.m.</b>

**IT IS SO ORDERED.**

Dated: April 1, 2016



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Troy L. Nunley  
United States District Judge