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4	Sacramento, CA 95814					
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10	Attorney for Plaintiffs Robyn Holloway					
11	and Sterling Holloway					
12						
13	NI THE INUTED OT A TEC DISTRICT COUDT					
14	IN THE UNITED STATES DISTRICT COURT					
15	EASTERN DISTRICT OF CALIFORNIA					
16						
17	ROBYN HOLLOWAY and STERLING	CASE NO. 2:12-cv-02120 MCE-CKD				
18	HOLLOWAY,					
19	Plaintiffs,	STIPULATION AND ORDER TO				
20	V.	MODIFY PRETRIAL SCHEDULING ORDER				
21	UNITED STATES OF AMERICA,					
21	Defendant.					
23 24	Plaintiffs Robyn Holloway and Starling L	Holloway and Defendant United States, by and				
24 25	Plaintiffs Robyn Holloway and Sterling Holloway and Defendant United States, by and					
25	through their respective counsel, stipulate and respectfully request the below modifications to the					
26	Court's Pretrial Scheduling Order (Dkt 39) for good cause.					
27	1. The parties have been cooperative in the discovery and case management process.					
28						
	STIPULATION AND ORDER TO TO MODIFY THE1PRETRIAL SCHEDULING ORDER - Holloway v. U.S., No. 12-cv-2120 MCE-CKD					
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1	2.	2. Plaintiffs are in the process of retaining additional counsel/ co-counsel, Wilcoxen					
2	Callaham LL	Callaham LLP, to represent them in this lawsuit and would like their new counsel to be involved					
3	in completing	pleting the fact discovery identified below.					
4	3.	Counsel for Plaintiffs and Defendant were in trials in June 2014 for other cases.					
5	4.	The parties respectfully request extending the fact discovery deadline limited to					
6	completing th	mpleting the following discovery:					
7		a. Plaintiffs to take the depositions of Israel Alvarado, Duane Barker,					
8	Christopher Leroux, John Pank, Lyn Phillips, and John Shaw.						
9	b. Plaintiffs to serve up to twenty-five (25) interrogatories.						
10	c. Defendant to take the depositions of Plaintiffs, Rob Anderson, and Cheyenne						
11		Sinkola.					
12	5.	As a result, the parties respectfully request extending all other deadlines.					
13	6.	The Court previously granted in part the parties' stipulated requests to modify the					
14	scheduling order. [Dkt 15, 26, 39]						
15		Proposed	Scheduling Modification				
15 16		<b>Proposed</b>	Scheduling Modification	Proposed			
	Disco	Proposed		<u>Proposed</u> September 30, 2014			
16			Current				
16 17	Initial	very cutoff (fact):	<u>Current</u> July 17, 2014	September 30, 2014			
16 17 18	Initial Supple	very cutoff (fact): expert disclosures: emental expert disclosures:	<u>Current</u> July 17, 2014 August 13, 2014 September 2, 2014	September 30, 2014 October 14, 2014 October 30, 2014			
16 17 18 19 20 21	Initial Supple Last d	very cutoff (fact): expert disclosures: emental expert disclosures: ay to file dispositive motions:	<u>Current</u> July 17, 2014 August 13, 2014 September 2, 2014 September 18, 2014	September 30, 2014 October 14, 2014 October 30, 2014 November 13, 2014			
16 17 18 19 20 21 22	Initial Supple Last d Last d	very cutoff (fact): expert disclosures: emental expert disclosures: ay to file dispositive motions: ay for dispositive motion hear	<u>Current</u> July 17, 2014 August 13, 2014 September 2, 2014 September 18, 2014 ing: November 13, 2014	September 30, 2014 October 14, 2014 October 30, 2014 November 13, 2014 January 8, 2015			
16 17 18 19 20 21 22 23	Initial Supple Last d Last d Joint I	very cutoff (fact): expert disclosures: emental expert disclosures: ay to file dispositive motions: ay for dispositive motion hear Final Pretrial Conference State	<u>Current</u> July 17, 2014 August 13, 2014 September 2, 2014 September 18, 2014 ing: November 13, 2014 ment: January 15, 2015	September 30, 2014 October 14, 2014 October 30, 2014 November 13, 2014 January 8, 2015 March 5, 2015			
<ol> <li>16</li> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> </ol>	Initial Supple Last d Last d Joint I Last d	very cutoff (fact): expert disclosures: emental expert disclosures: ay to file dispositive motions: ay for dispositive motion hear Final Pretrial Conference State ay to file evidentiary or	<u>Current</u> July 17, 2014 August 13, 2014 September 2, 2014 September 18, 2014 ing: November 13, 2014	September 30, 2014 October 14, 2014 October 30, 2014 November 13, 2014 January 8, 2015			
<ol> <li>16</li> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> <li>25</li> </ol>	Initial Supple Last d Last d Joint I Last d procee	very cutoff (fact): expert disclosures: emental expert disclosures: ay to file dispositive motions: ay for dispositive motion hear Final Pretrial Conference State ay to file evidentiary or dural motions:	<u>Current</u> July 17, 2014 August 13, 2014 September 2, 2014 September 18, 2014 ing: November 13, 2014 ment: January 15, 2015 January 15, 2015	September 30, 2014 October 14, 2014 October 30, 2014 November 13, 2014 January 8, 2015 March 5, 2015 March 5, 2015			
<ol> <li>16</li> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> <li>25</li> <li>26</li> </ol>	Initial Supple Last d Last d Joint I Last d procee Last d	very cutoff (fact): expert disclosures: emental expert disclosures: ay to file dispositive motions: ay for dispositive motion hear Final Pretrial Conference State ay to file evidentiary or dural motions: ay to file trial briefs:	<u>Current</u> July 17, 2014 August 13, 2014 September 2, 2014 September 18, 2014 ing: November 13, 2014 ment: January 15, 2015 January 15, 2015 January 22, 2015	September 30, 2014 October 14, 2014 October 30, 2014 November 13, 2014 January 8, 2015 March 5, 2015 March 5, 2015 March 12, 2015			
<ol> <li>16</li> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> <li>25</li> </ol>	Initial Supple Last d Last d Joint I Last d procee Last d	very cutoff (fact): expert disclosures: emental expert disclosures: ay to file dispositive motions: ay for dispositive motion hear Final Pretrial Conference State ay to file evidentiary or dural motions:	<u>Current</u> July 17, 2014 August 13, 2014 September 2, 2014 September 18, 2014 ing: November 13, 2014 ment: January 15, 2015 January 15, 2015	September 30, 2014 October 14, 2014 October 30, 2014 November 13, 2014 January 8, 2015 March 5, 2015 March 5, 2015			

STIPULATION AND ORDER TO TO MODIFY THE2PRETRIAL SCHEDULING ORDER - Holloway v. U.S., No. 12-cv-2120 MCE-CKD

1	Trial (5 days, bench):	March	23, 2015	May 11, 2015	
2	Dated: July 7, 2014		Respectfully submit	ted,	
3		By:	/s/ John G. Bilheim		
4		29.	JOHN G. BILHEIM		
5 6				ffs Robyn Holloway and	
7					
8	Dated: July 7, 2014		BENJAMIN B. WA United States Attorr		
9		By:	/s/ Chi Soo Kim		
10			CHI SOO KIM Assistant U.S. Attor	nev	
11				2	
12					
13		OF	RDER		
14	IT IS SO ORDERED.				
15					
16	Dated: July 22, 2014	11	nFC	2	
17		Ma	un IX	1.	
18			C. ENGLAND, JR., CH TES DISTRICT COUR		
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27					
28					
	STIPULATION AND ORDER TO TO MODIFY THE 3 PRETRIAL SCHEDULING ORDER - <i>Holloway v. U.S.</i> , No. 12-cv-2120 MCE-CKD				