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13	PADILLA, MD, PAM HARRIS, GEORGE McKEEL, JAMES TIDWELL, DAVID	
14	PANTOJA, KEN BECKER, MICHAEL	
15	MATRANGA, MICHAEL XIONG, and SCOTT HUFFORD	
16	UNITED STATES D	ISTRICT COURT
17	EASTERN DISTRICT	COF CALIFORNIA
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19	Estate of MARK ANTHONY SCOTT, et al.,	NO. 2:13-CV-00024-GEB-KJN
20	Plaintiffs,	
21		
		STIDUL ATION AND (DDODOGED)
22	VS.	STIPULATION AND [PROPOSED] ORDER FOR EXTENSION OF TIME
22 23	vs. COUNTY OF SACRAMENTO, et al.,	
		ORDER FOR EXTENSION OF TIME FOR ALL PARTIES TO DISCLOSE
23	COUNTY OF SACRAMENTO, et al.,	ORDER FOR EXTENSION OF TIME FOR ALL PARTIES TO DISCLOSE
23 24	COUNTY OF SACRAMENTO, et al.,	ORDER FOR EXTENSION OF TIME FOR ALL PARTIES TO DISCLOSE
23 24 25	COUNTY OF SACRAMENTO, et al., Defendants.	ORDER FOR EXTENSION OF TIME FOR ALL PARTIES TO DISCLOSE
23 24 25 26	COUNTY OF SACRAMENTO, et al., Defendants.	ORDER FOR EXTENSION OF TIME FOR ALL PARTIES TO DISCLOSE
 23 24 25 26 27 	COUNTY OF SACRAMENTO, et al., Defendants.	ORDER FOR EXTENSION OF TIME FOR ALL PARTIES TO DISCLOSE

1	COME NOW THE PARTIES, by and through their respective attorneys and subject
2	to the approval of this Court, hereby stipulate and respectfully request the following
3	modification and/or amendment to this Court's Pretrial Scheduling Order of March 28, 2013
4	(Docket #24), amended on April 8, 2014 (Docket #34) regarding the scheduling of this case:
5	• That the expert witness disclosure cut-off date currently set for August 8, 2014 be
6	moved to September 19, 2014, and any supplemental disclosures be due within 30
7	days following.
8	This calendaring modification is requested because although the parties have been
9	cooperatively engaging in the discovery process, there are still numerous depositions which
10	need to be conducted prior to the experts being in a position to prepare their reports.
11	Additionally, the fact that there are three sets of attorneys involved has made it somewhat
12	more difficult to schedule depositions despite the parties' cooperative spirit. Furthermore,
13	these depositions will put the parties in a better position to see which claims can be
14	eliminated prior to the filing of any dispositive motions.
15	The parties do not expect to change any of the other dates currently scheduled in this
16	case.
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18	IT IS SO STIPULATED.
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20	Dated: July 16, 2014LAW OFFICE OF STEWART KATZ
21	/s/ Stewart Katz
22	STEWART KATZ,
23	Attorney for Plaintiffs
24	Dated: July 16, 2014 LONGYEAR, O'DEA & LAVRA, LLP
25	
26	<u>/s/ Van Longyear</u> VAN LONGYEAR
27	Attorneys for Defendant CARYL SKERITT, RN
28	CARTE SKEKITT, KN
	STIPULATION AND [PROPOSED] ORDER FOR EXTENSION OF TIME FOR ALL PARTIES TO DISCLOSE EXPERT WITNESSES
	2

1	Dated: July 16, 2014 RIVERA & ASSOCIATES
2	/s/ Jesse M. Rivera
3	JESSE M. RIVERA
4	Attorneys for Defendants COUNTY OF SACRAMENTO, SCOTT
5	JONES, ROSEANNE RICHAEL, JAMIE LEWIS, AARON BREWER, ROBERT
6	PADILLA, MD, PAM HARRIS, GEORGE
7	McKEEL, JAMES TIDWELL, DAVID PANTOJA, KEN BECKER, MICHAEL
8	MATRANGA, MICHAEL XIONG, and SCOTT HUFFORD
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12	IT IS SO ORDERED:
14	Dated: July 16, 2014
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17	GARLAND E. BURRELL, JR.
18	Senior United States District Judge
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	STIPULATION AND [PROPOSED] ORDER FOR EXTENSION OF TIME FOR ALL PARTIES TO DISCLOSE EXPERT WITNESSES 3