

1 **LAW OFFICE OF STEWART KATZ**
2 Stewart Katz, SBN # 127425
3 555 University Avenue, Suite 270
4 Sacramento, CA 95825
5 Tel: (916) 444-5678

6
7 Attorney for Plaintiff
8 **ROBERT I. REESE, JR.**

9 **PORTER | SCOTT**
10 A PROFESSIONAL CORPORATION
11 John R. Whitefleet, SBN 213301
12 Taylor W. Rhoan, SBN 294941
13 350 University Avenue, Suite 200
14 Sacramento, California 95825
15 TEL: 916.929.1481
16 FAX: 916.927.3706

17 Attorneys for Defendants COUNTY OF SACRAMENTO, SCOTT JONES, JOSEPH MILLICAN,
18 ZACHARY ROSE, and DUNCAN BROWN

19
20
21
22
23
24
25
26
27
28
UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

19 **ROBERT I. REESE, JR.,**
20
21 Plaintiff,

Case No.: 2:13-cv-00559-JAM-DAD

22 vs.

STIPULATION AND ORDER TO MODIFY SCHEDULING ORDER

Scheduling Order entered on: 05/10/2013

23 COUNTY OF SACRAMENTO; Sacramento
24 County Sheriff's Department Deputy
25 DUNCAN BROWN (Badge #1220);
26 Sacramento County Sheriff's Department
27 Deputy ZACHARY ROSE (Badge #832);
28 Sacramento County Sheriff's Department
Sergeant JOSEPH MILLICAN (Badge #246);
and Sacramento County Sheriff SCOTT
JONES.

Defendants.

_____ /

1 IT IS HEREBY STIPULATED AND AGREED by and between Plaintiff ROBERT REESE
2 and Defendants COUNTY OF SACRAMENTO, SCOTT JONES, JOSEPH MILLICAN, ZACHARY
3 ROSE, and DUNCAN BROWN, by and through their undersigned Counsel, pursuant to Local Rule
4 143 as follows:

5 1. The parties respectfully request that the District Court modify the Pretrial Scheduling
6 Order to continue discovery deadlines to allow for additional time to conduct discovery of expert
7 witnesses, based on good cause appearing as more fully set forth below.

8 2. The parties have previously modified discovery and expert disclosure deadlines on two
9 prior occasions by Stipulation and Order on March 5, 2014 (Document 18) and June 17, 2014
10 (Document 20.) The other deadlines including the dates originally set for trial, pretrial conference and
11 dispositive hearing, as well as the associated deadlines, were previously modified by the Scheduling
12 Order on June 17, 2014 (Document 20.)

13 3. Due to the large number of witnesses and potential experts has complicated the
14 deadlines for disclosure and thus intruded on the time to conduct expert depositions, expert discovery
15 and prepare expert reports. In addition, unexpected expert and scheduling complications have rendered
16 the current discovery dates unworkable. The parties submit good cause exists to further modify the
17 scheduling order to amend discovery deadlines only by two weeks each.

18 4. Therefore, the parties respectfully submit that good cause exists to amend the discovery
19 deadlines of the Pretrial Scheduling Order dated June 17, 2014, as follows:

<u>Deadline</u>	<u>Old Date</u>	<u>New Date</u>
Expert witness disclosure deadline	February 13, 2015	February 27, 2015
Supplemental and Rebuttal witness disclosure deadline	February 20, 2015	March 13, 2015
Close of discovery	April 17, 2015	April 30, 2015
Dispositive motion filing	June 3, 2015	Unmodified
Dispositive motion hearing	July 1, 2015 at 9:30 a.m	Unmodified
Joint Pretrial Statement due	July 31, 2015	Unmodified
Pretrial Conference	August 7, 2015 at 11:00 a.m.	Unmodified

Trial	September 14, 2015 at 9:00 a.m.	Unmodified
-------	------------------------------------	------------

This Stipulation may be signed in counterparts and any facsimile or electronic signature shall be as valid as an original signature.

IT IS SO STIPULATED.

Dated: January 2, 2015

LAW OFFICE OF STEWART KATZ

By /s/ Stewart Katz as authorized on 12/30/14
Stewart Katz
Attorney for Plaintiff ROBERT REESE

Dated: January 2, 2015

PORTER SCOTT
A PROFESSIONAL CORPORATION

By /s/ John R. Whitefleet
John R. Whitefleet
Taylor W. Rhoan
Attorneys for Defendants COUNTY OF
SACRAMENTO, DEPUTY DUNCAN BROWN,
DEPUTY ZACHARY ROSE, DEPUTY JOSEPH
MILLICAN, and SHERIFF SCOTT JONES

ORDER

Having reviewed the above stipulation and good cause appearing therefore, IT IS HEREBY ORDERED that the Pretrial Scheduling Order, be modified with the new schedule as set forth above.

IT IS SO ORDERED.

Dated: 1/2/2015

/s/ John A. Mendez
United States District Court Judge