

1 KEKER, VAN NEST & PETERS LLP
 STEVEN P. RAGLAND - # 221076
 2 sragland@keker.com
 AJAY S. KRISHNAN - # 222476
 3 akrishnan@keker.com
 TAYLOR GOOCH - # 294282
 4 tgooch@keker.com
 633 Battery Street
 5 San Francisco, CA 94111-1809
 Telephone: 415 391 5400

6 ATABEK & ASSOCIATES, P.C.
 7 JON A. ATABEK, ESQ. - # 269497
 jatabek@atabeklaw.com
 8 300 Spectrum Center Dr., Ste.400
 Irvine, CA 92618
 9 Telephone: 213 394 5943

10 DISABILITY RIGHTS LEGAL CENTER
 MARONEL BARAJAS - #242044
 11 maronel.barajas@drlcenter.org
 ANNA RIVERA - # 239601
 12 anna.rivera@drlcenter.org
 350 S. Grand Avenue, Suite 1520
 13 Los Angeles, CA 90071
 Telephone: 213 736 1031

14 Attorneys for Plaintiffs
 15 EVERETT JEWETT, LEGAL SERVICES
 FOR PRISONERS WITH CHILDREN, GLEN
 16 HAROLD EVERETT, MICHAEL DONALD
 ACKLEY, HAROLD ROBERT MARQUETTE

17 UNITED STATES DISTRICT COURT
 18 EASTERN DISTRICT OF CALIFORNIA

19 EVERETT JEWETT, LEGAL SERVICES
 FOR PRISONERS WITH CHILDREN,
 20 GLEN HAROLD EVERETT, MICHAEL
 DONALD ACKLEY, HAROLD
 21 ROBERT MARQUETTE, on behalf of
 themselves and all others similarly
 22 situated,

Plaintiffs,

v.

23 SHASTA COUNTY SHERIFF'S
 24 DEPARTMENT, a public entity; TOM
 BOSENKO, as Sheriff of the Shasta
 25 County; SHASTA COUNTY, a public
 entity; and CALIFORNIA FORENSIC
 26 MEDICAL GROUP, INC. a private entity;
 and DOES 1 through 25, in their
 27 individual capacities,

28 Defendants.

LAW OFFICES OF JEROME VARANINI
 JEROME MARTIN VARANINI - #58531
 jvaranini@tsvlaw.com
 641 Fulton Avenue, Suite 200
 Sacramento, CA 95825
 Telephone: 916-993-4868

Attorney for Defendant
 CALIFORNIA FORENSIC MEDICAL
 GROUP, INC.

BRICKWOOD LAW OFFICE
 Gary Charles Brickwood
 office@brickwoodlaw.com
 1135 Pine Street, Suite 210
 Redding, CA 96001
 Telephone: 530-245-1877

Attorney for Defendants SHASTA
 COUNTY SHERIFF'S DEPARTMENT,
 TOM BOSENKO, in his official capacity,
 and SHASTA COUNTY

Case No. 2:13-cv-0882 MCE AC (PC)

**JOINT STIPULATION AND ~~PROPOSED~~
 ORDER EXTENDING CASE DEADLINES**

Judge: Hon. Allison Claire

Date Filed: May 6, 2013

Trial Date: None Set

1 The parties, through their attorneys of record, stipulate and jointly request that the Court
2 vacate the current case schedule and reset all dates for six months from the current dates for the
3 following reasons:

- 4 1. The parties have previously filed, and been granted, three requests for an extension of
5 discovery cut-off and dispositive motion deadline. The parties' prior requests for an
6 extension of the discovery cut-off were granted on March 4, 2015, August 28, 2015,
7 March 16, 2016, and February 3, 2017. Since the Court's February 3, 2017 order, the
8 parties have engaged in written discovery and attended a settlement conference.
- 9 2. The parties are currently engaged in settlement negotiations and need additional time
10 for these negotiations.
- 11 3. The parties hereby stipulate and jointly request the Court vacate the present discovery
12 cut-off and deadlines for filing of dispositive motions contained in the February 3,
13 2017 Order.
- 14 4. The parties hereby stipulate and jointly request the Court set the following scheduling
15 order:
 - 16 a. Fact discovery shall be completed by March 30, 2018. Motions to compel
17 must be heard not later than March 16, 2018.
 - 18 b. Initial expert disclosures shall be made on or before April 30, 2018; rebuttal
19 expert disclosures shall be made on or before May 18, 2018.
 - 20 c. All pretrial motions, except motions to compel discovery, shall be completed
21 on or before June 30, 2018.
 - 22 d. The parties are ordered to file a Joint Notice of Trial Readiness not later than
23 thirty (30) days after receiving the Court's ruling(s) on the last filed dispositive
24 motion(s). If the parties do not intend to file dispositive motions, the parties
25 are ordered to file a Joint Notice of Trial Readiness not later than thirty (30)
26 days after the close of discovery and the notice must include statements of
27 intent to forgo the filing of dispositive motions. After review of the parties'
28 Joint Notice of Trial Readiness, the Court will issue an order that sets forth

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dates for a final pretrial conference and trial.

e. Failure to comply with the terms of this order may result in the imposition of monetary and all other sanctions within the power of the court, including dismissal or an order of judgment.

5. The parties submit concurrently with this stipulation a proposed order for consideration by the Court.

Dated: May 24, 2017

Dated: May 24, 2017

KEKER, VAN NEST & PETERS LLP

LAW OFFICES OF JEROME M. VARANINI

By: s/Taylor Gooch
TAYLOR GOOCH

By: s/Jerome Martin Varanini (as authorized on May 24, 2017)

JEROME MARTIN VARANINI
jvaranini@tsvlaw.com
641 Fulton Avenue, Suite 200
Sacramento, CA 95825

STEVEN P. RAGLAND - # 221076
sragland@keker.com
AJAY S. KRISHNAN - # 222476
akrishnan@keker.com
TAYLOR GOOCH - # 294282
tgooch@keker.com
633 Battery Street
San Francisco, CA 94111-1809
Telephone: 415 391 5400

Attorney for Defendant
CALIFORNIA FORENSIC MEDICAL
GROUP, INC.

JON A. ATABEK, ESQ. - # 269497
ATABEK & ASSOCIATES, P.C.
jatabek@atabeklaw.com
300 Spectrum Center Dr., Ste.400
Irvine, CA 92618
Telephone: 213 394 5943

Dated: May 24, 2017

BRICKWOOD LAW OFFICE

MARONEL BARAJAS - #242044
Maronel.Barajas@drlcenter.org
ANNA RIVERA - # 239601
DISABILITY RIGHTS LEGAL CENTER
Anna.Rivera@drlcenter.org
350 S. Grand Avenue, Suite 1520
Los Angeles, CA 90071
Telephone: 213 736 1031

By: s/Gary Charles Brickwood (as authorized on May 24, 2017)

GARY CHARLES BRICKWOOD
office@brickwoodlaw.com
1135 Pine Street, Suite 210
Redding, CA 96001
Telephone: 530 245 1877

Attorney for Defendants SHASTA COUNTY
SHERIFF'S DEPARTMENT, TOM
BOSENKO, AND SHASTA COUNTY

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EVERETT JEWETT, LEGAL SERVICES
FOR PRISONERS WITH CHILDREN, GLEN
HAROLD EVERETT, MICHAEL DONALD
ACKLEY, HAROLD ROBERT
MARQUETTE

1 **~~Proposed~~ ORDER**


2 On May 24, 2017 the parties, through their attorneys of record, filed a Joint Stipulation
3 and proposed Order Extending Case Deadlines. Good cause appearing, the motion is granted.

4 Accordingly, IT IS HEREBY ORDERED:

- 5 1. The present discovery cut-off and deadlines for filing of dispositive motions contained
6 in the February 3, 2017 Order are vacated.
- 7 2. Fact discovery shall be completed by March 30, 2018. Motions to compel must be
8 heard not later than March 16, 2018.
- 9 3. Initial expert disclosures shall be made on or before April 30, 2018; rebuttal expert
10 disclosures shall be made on or before May 18, 2018.
- 11 4. All pretrial motions, except motions to compel discovery, shall be completed on or
12 before June 30, 2018.
- 13 5. The parties are ordered to file a Joint Notice of Trial Readiness not later than thirty
14 (30) days after receiving the Court's ruling(s) on the last filed dispositive motion(s). If
15 the parties do not intend to file dispositive motions, the parties are ordered to file a
16 Joint Notice of Trial Readiness not later than thirty (30) days after the close of
17 discovery and the notice must include statements of intent to forgo the filing of
18 dispositive motions. After review of the parties' Joint Notice of Trial Readiness, the
19 Court will issue an order that sets forth dates for a final pretrial conference and trial.
- 20 6. Failure to comply with the terms of this order may result in the imposition of monetary
21 and all other sanctions within the power of the court, including dismissal or an order
22 of judgment.

23 IT IS SO ORDERED.

24 DATED: May 25, 2017

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26 ALLISON CLAIRE
27 UNITED STATES MAGISTRATE JUDGE
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