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and Larry Mammen individually  
and as Guardian Ad Litem

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

A.P. (a minor); ROBIN MAMMEN and  
LARRY MAMMEN individually and as  
Guardian ad Litem for A.P.,  
  
Plaintiffs,  
  
vs.  
  
COMMUNITY CARE LICENSING,  
COUNTY OF SACRAMENTO, STEPHANIE  
LYNCH, LUIS VILLA; MICHELLE  
CALLEJAS, DEBRA WILLIAMS, CRAIG  
LARKIN, RENAE RODOCKER,  
  
Defendants.

**Case No.: 2:13-cv-01588-JAM-AC**  
**STIPULATION AND ORDER TO**  
**MODIFY THE PRETRIAL SCHEDULING**  
**ORDER**

STIPULATION AND [PROPOSED] ORDER TO MODIFY THE PRETRIAL SCHEDULING ORDER

COMES NOW THE PARTIES by and through their respective attorneys and subject to the approval of this Court, hereby stipulate and respectfully request the following modifications and/or amendments to this Court's Pretrial Scheduling Order dated November 24, 2014 [ECF No. 60]:

- That the expert witness disclosure deadline, currently set for June 8, 2017, be moved to July 8, 2017;
- That the supplemental expert witness disclosure deadline, currently set for June 29, 2017, be moved to July 29, 2017;
- That the completion of phase II discovery, currently set for July 24, 2017, be moved to September 1, 2017;
- That the deadline for filing dispositive motions, currently set for July 27, 2016, be moved to October 19, 2017;
- That the deadline for filing phase II dispositive motions, currently set for August 24, 2017, be moved to **October 10**, 2017;
- That the deadline for hearing phase II dispositive motions, currently set for September 26, 2017, be moved to **November 7**, 2017 at 1:30 p.m.;

WHEREAS, counsel for all parties have met and discussed the posture of this case, and agree that it would be in the interests of justice as set forth in the Declaration of John Lavra filed herewith that good causes exists for a modification of the scheduling order;

WHEREAS, this stipulation and proposed order is based on the need for additional time to conduct the above mentioned discovery, complete written discovery, and file pretrial motions;

WHEREAS, this request is not being made for the purpose of delay, or any other improper purpose; and

THEREFORE, IT IS HEREBY STIPULATED and agreed by and between the parties that this Court modifies the pretrial deadlines and trial date as set forth above.

STIPULATION AND [PROPOSED] ORDER TO MODIFY THE PRETRIAL SCHEDULING ORDER

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2 **IT IS SO STIPULATED.**  
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4 Dated: May 8, 2017

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

6 By: /s/ John A. Lavra

7 JOHN A. LAVRA  
8 AMANDA L. MCDERMOTT

9 Dated: May 8, 2017

**LEIGH LAW GROUP**

10 By: /s/ Jay T. Jambeck

11 JAY T. JAMBECK  
12 MANDY G. LEIGH

13  
14 **IT IS SO ORDERED AS MODIFIED BY THE COURT.**

15 Dated: 5/8/2017

/s/ John A. Mendez

16 JOHN A. MENDEZ  
17 United States District Court Judge  
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