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 and Larry Mammen individually  
 15 and as Guardian Ad Litem

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

18 A.P. (a minor); ROBIN MAMMEN and )  
 LARRY MAMMEN individually and as )  
 19 Guardian ad Litem for A.P., )

20 Plaintiffs, )

21 vs. )

22 COMMUNITY CARE LICENSING, )  
 COUNTY OF SACRAMENTO, STEPHANIE )  
 23 LYNCH, LUIS VILLA; MICHELLE )  
 CALLEJAS, DEBRA WILLIAMS, CRAIG )  
 24 LARKIN, RENAE RODOCKER, )

25 Defendants. )  
 26 )  
 27 )  
 28 )

**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

1 COMES NOW THE PARTIES by and through their respective attorneys and subject to  
2 the approval of this Court, hereby stipulate and respectfully request the following modifications  
3 and/or amendments to this Court's Pretrial Scheduling Orders dated September 21, 2016 [ECF  
4 No. 74] and May 8, 2017 [ECF No. 103]:

	<u>Current Schedule</u>	<u>Proposed New Schedule</u>	
5			
6	Expert Disclosure:	July 8, 2017	Aug. 8, 2017
7	Supplemental Expert Disclosure:	July 29, 2017	Aug. 22, 2017
8	Close of Phase 2 Discovery:	Sept. 1, 2017	Sept. 22, 2017

9  
10 WHEREAS, the parties request no modification or amendment to the following pretrial  
11 and trial dates [See ECF Nos. 74 and 103]:

	<u>Current Schedule</u>
12	
13	Filing of Dispositive Motion, Phase 2: Oct. 10, 2017
14	Hearing of Dispositive Motions, Phase 2: Nov. 7, 2017, at 1:30p
15	Joint Pretrial Statement: Dec. 1, 2017
16	Final Pretrial Conference: Dec. 8, 2017, at 11:00a
17	Trial: Jan. 8, 2018, at 9:00a

18  
19 WHEREAS, counsel for all parties have met and discussed the posture of this case, and  
20 agree that it would be in the interests of justice and judicial economy and that good causes exists  
21 for the modification of the scheduling order;

22 WHEREAS, the parties continue to engage in settlement discussions and need additional  
23 time to determine whether resolution of this matter without further litigation is possible at this  
24 time;

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

27 ///

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

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

3  
4 **IT IS SO STIPULATED.**

5 Dated: June 29, 2017

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

7 By: /s/ Amanda L. McDermott

8 JOHN A. LAVRA  
9 AMANDA L. MCDERMOTT

10 Dated: June 29, 2017

**LEIGH LAW GROUP**

11 /s/ Jay T. Jambeck

12 By: JAY T. JAMBECK  
13 MANDY G. LEIGH

14  
15 **IT IS SO ORDERED.**

16 Dated: \_6/29/2017

/s/ John A. Mendez

17 JOHN A. MENDEZ  
18 United States District Court Judge