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 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.)

Case No.: 2:13-cv-01588-JAM-AC

26 **STIPULATION AND ORDER TO**
MODIFY THE PRETRIAL SCHEDULING
ORDER

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 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 Order dated June 30, 2017 [ECF No.
4 105]:

- 5 ■ That the close of phase 2 discovery, currently set for September 22, 2017, be moved
6 to November 9, 2017;

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

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

13 WHEREAS, the parties require additional time to complete expert discovery;

14 WHEREAS, the parties do not intend to file further dispositive motions;

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

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

19 **IT IS SO STIPULATED.**

20 Dated: September 6, 2017

LONGYEAR, O'DEA & LAVRA, LLP

21 By: /s/ Amanda L. McDermott

22 JOHN A. LAVRA
23 AMANDA L. MCDERMOTT

24 Dated: September 6, 2017

LEIGH LAW GROUP

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26 By: /s/ Jay T. Jambeck

27 JAY T. JAMBECK
28 MANDY G. LEIGH

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IT IS SO ORDERED.

Dated: 9/6/2017 _____ /s/ John A. Mendez _____

JOHN A. MENDEZ
United States District Court Judge