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Attorneys for Defendant

COUNTY OF SACRAMENTO

Exempt From Filing Fees Pursuant to Government Code § 6103

UNITED STATES DISTRICT COURT
 EASTERN DISTRICT OF CALIFORNIA

CHARLET INTHAVONGXAY,

No. 2:13-cv-02249-WBS-DAD

Plaintiff,

**JOINT STIPULATION AND ORDER TO
 EXTEND EXPERT DISCLOSURE AND
 REBUTTAL DEADLINE**

v.

COUNTY OF SACRAMENTO ET AL.,

Defendants

This Stipulation is entered into by and between Plaintiff CHARLET INTHAVONGXAY and Defendant COUNTY OF SACRAMENTO. The Parties have conferred and agree to continue the expert disclosure date for 61 days, from June 26, 2015 to August 26, 2015, and the rebuttal reports 60 days, from July 24, 2015 to September 22, 2015.

The parties have good cause to request an extension for the expert disclosure deadline because the discovery process was delayed by the late completion of Rule 26(a)(1) Disclosures. Defendant provided Rule 26(a)(1) disclosures on December 8, 2014. However, Plaintiff's Rule 26(a)(1) Disclosures were not provided until March 23, 2015. After receiving Plaintiff's Rule 26(a)(1) Disclosures, Defendant propounded discovery and anticipates responses within the next week. In addition, the parties are planning the deposition of Katherine Nickerson at Plaintiff's

1 request, and the deposition of Plaintiff, Charlet Inthavongxay at Defendant's request.

2 The Parties wish to postpone the expert disclosures until they have had a chance to receive
3 discovery responses and take depositions. The Parties stipulate to extend the expert disclosure
4 date to August 26, 2015. Accordingly, the time for the rebuttal reports will need to be extended as
5 well. The parties agree to September 22, 2015 as the date for the rebuttal reports. This will still
6 allow for Discovery to be completed by the present November 6, 2015 deadline and need not
7 disrupt the remaining trial schedule. The amended schedule also comports with the Federal
8 Requirement that disclosures be made 90 days before trial. Fed. R. Civ. P. 26(a)(2)(D).

9
10 Respectfully submitted,

11 Dated: June 19, 2015

RUSSELL A. ROBINSON

12
13 By /s/ Russell A. Robinson (authorized on 6/19/15)
14 Russell A. Robinson
15 Attorney for Plaintiff
16 CHARLET INTHAVONGXAY

17 Dated: June 22, 2015

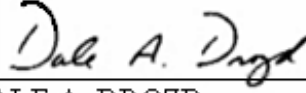
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18
19 By /s/ Ariana A. Van Alstine
20 David P.E. Burkett
21 Ariana A. Van Alstine
22 Attorneys for Defendant
23 COUNTY OF SACRAMENTO
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ORDER

Pursuant to the parties' stipulation, IT IS SO ORDERED.

Dated: June 22, 2015



DALE A. DROZD
UNITED STATES MAGISTRATE JUDGE

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