

1 **P O R T E R | S C O T T**

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7 COUNTY OF SACRAMENTO

8 ***Exempt From Filing Fees Pursuant to Government Code § 6103***9 **UNITED STATES DISTRICT COURT**
10 **EASTERN DISTRICT OF CALIFORNIA**

11 CHARLET INTHAVONGXAY,

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

13 Plaintiff,

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

15 v.

16 COUNTY OF SACRAMENTO ET AL.,

17 Defendants

18 /

19 This Stipulation is entered into by and between Plaintiff CHARLET INTHAVONGXAY
20 and Defendant COUNTY OF SACRAMENTO. The Parties have conferred and agree to continue
21 the expert disclosure date for 61 days, from June 26, 2015 to August 26, 2015, and the rebuttal
22 reports 60 days, from July 24, 2015 to September 22, 2015.23 The parties have good cause to request an extension for the expert disclosure deadline
24 because the discovery process was delayed by the late completion of Rule 26(a)(1) Disclosures.
25 Defendant provided Rule 26(a)(1) disclosures on December 8, 2014. However, Plaintiff's Rule
26 26(a)(1) Disclosures were not provided until March 23, 2015. After receiving Plaintiff's Rule
27 26(a)(1) Disclosures, Defendant propounded discovery and anticipates responses within the next
28 week. In addition, the parties are planning the deposition of Katherine Nickerson at Plaintiff'sPORTER | SCOTT
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request, and the deposition of Plaintiff, Charlet Inthavongxay at Defendant's request.

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

Respectfully submitted,

Dated: June 19, 2015

RUSSELL A. ROBINSON

By /s/ Russell A. Robinson (authorized on 6/19/15)
Russell A. Robinson
Attorney for Plaintiff
CHARLET JINTHAVONGXAY

Dated: June 22, 2015

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By /s/ Ariana A. Van Alstine

David P.E. Burkett
Ariana A. Van Alstine
Attorneys for Defendant
COUNTY OF SACRAMENTO

ORDER

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

Dated: June 22, 2015

Dale A. Drozd
DALE A. DROZD
UNITED STATES MAGISTRATE JUDGE

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