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9 IN THE UNITED STATES DISTRICT COURT
 10 FOR THE EASTERN DISTRICT OF CALIFORNIA

12 **ADVANCED BUILDING &**
 13 **FABRICATION, INC., a California**
 14 **Corporation, ROBERT HONAN, an**
 15 **individual,**
 Plaintiffs,
 16
 17 **v.**
 18 **CALIFORNIA HIGHWAY PATROL, John**
 19 **Wilson, an individual, Curtis J. Ayers, an**
 20 **individual, and DOES 1 to 20, inclusive,**
 Defendants.

2:13-cv-02380-MCE-CKD

**JOINT STIPULATION REGARDING
MODIFICATION OF PRETRIAL
SCHEDULING ORDER [DOC 42]**

Trial Date: None

Action Filed: September 27, 2013

21 This case relates to events beginning in May 2012 (including searches of Plaintiffs Robert
 22 L. Honan and Advanced Building & Fabrication, Inc., on May 30, 2012) and now-dismissed
 23 criminal charges against Mr. Honan.

24 Over the last few months, the parties have engaged in significant discovery, including
 25 document requests, interrogatories, requests for admissions, third party subpoenas, and multiple
 26 depositions. However, because of the large number of witnesses and depositions to be taken, it is
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1 proving impractical to schedule all the remaining witnesses before the September 12, 2016
2 discovery cutoff provided by the Court's Pretrial Scheduling Order [DOC 42].

3 On August 11, 2016, counsel for both parties met and conferred by email regarding
4 extending some of the dates outlined in the Scheduling Order. Both parties are in the process of
5 discussing and noticing dates for witness depositions. Both parties are working cooperatively on
6 discovery and hope to avoid discovery disputes. There is currently no assigned trial date.

7 Because of the parties' conflicting schedules and the extensive number of witnesses who
8 have to be deposed in this case, as well as the voluminous amount of discovery that still needs to
9 be completed, the parties respectfully request that the Court approve the following date
10 modifications set forth below. The parties seek to compress the schedule, rather than extending
11 all deadlines set by the Court, so that there is no impact to the timeline for disposition of the case,
12 including the trial date still to be set:

13			
14	Non-expert Discovery Cutoff	September 12, 2016	November 14, 2016
15	Initial Expert Disclosures	November 14, 2016	December 14, 2016
16	Supplemental Expert Disclosures	December 14, 2016	January 12, 2017
17	Last Day to Hear Dispositive Motions	March 9, 2017	No Change
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FOR GOOD CAUSE SHOWN, the parties hereby stipulate that, with the Court’s permission, the Court’s Pretrial Scheduling Order be modified to reflect the three new deadlines set forth above.

Dated: August 12, 2016

Respectfully submitted,
NOSSAMAN LLP
“/s/ Brendan Macaulay”

BY: BRENDAN MACAULAY, ESQ.
Attorney for Plaintiffs Advanced Building & Fabrication, Inc. and Robert Lee Honan

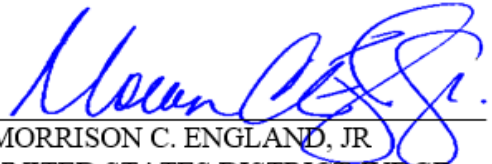
Dated: August 12, 2016

CALIFORNIA ATTORNEY GENERAL’S OFFICE
“/s/ Oliver R. Lewis”

BY: OLIVER R. LEWIS, ESQ.
Attorney for Defendants California Highway Patrol, John Wilson and Curtis Ayers

IT IS SO ORDERED.

Dated: August 22, 2016



MORRISON C. ENGLAND, JR.
UNITED STATES DISTRICT JUDGE