

1 **WILKE, FLEURY, HOFFELT, GOULD**
& BIRNEY, LLP
2 ROBERT F. TYLER, JR. (SBN 63055)
rtyler@wilkefleury.com
3 NEAL C. LUTTERMAN (SBN174681)
nlutterman@wilkefleury.com
4 400 Capitol Mall, Twenty-Second Floor
Sacramento, California 95814
5 Telephone: (916) 441-2430
Facsimile: (916) 442-6664
6 Attorneys for Defendants Regents of the
University Of California, now sued as The
7 University Of California Davis Health
System, and Dr. Gregory Sokolov and Dr.
8 Robert Hales

PORTER SCOTT
John R. Whitefleet, Esq.
rwhitefleet@porterscott.com
Adam Debow, Esq.
adebow@porterscott.com
350 University Avenue, Suite 200
Sacramento, CA 95825
Telephone: (916) 929-1481
Facsimile: (916) 927-3706
Attorneys for Defendant Ivan Orozco

9 **HADSELL STORMER & RENICK LLP**
Barbara Enloe Hadsell, Esq.
10 bhadsell@hadsellstormer.com
Joshua Piovia-Scott, Esq.
11 jps@hadsellstormer.com
Daniel Stormer, Esq.
12 dstormer@hadsellstormer.com
Acivi Coromelas, Esq.
13 acoromelas@hadsellstormer.com
Caitlan McLoon, Esq.
14 cmcloon@hadsellstormer.com
128 N. Fair Oaks Ave.
Pasadena, CA 91103
15 Telephone: (626) 585-9600
16 Facsimile: 626-577-7079
RIFKIN LAW OFFICE
17 Lori Rifkin, Esq.
lrifkin@rifkinlawoffice.com
18 P.O. Box 19169
Oakland, CA 94619
19 Facsimile: (415) 685-9351
20 Attorneys for Plaintiffs James Joshua
Mayfield, James Allison Mayfield, Jr., and
21 Terri Mayfield

LONGYEAR, O'DEA & LAVRA, LLP
Van Longyear, Esq.
longyear@longyearlaw.com
Peter C. Zilaff, Esq.
zilaff@longyearlaw.com
Nicole Cahill, Esq.
cahill@longyearlaw.com
3620 American River Drive, Ste. 230
Sacramento, CA 95864
Telephone: (916) 974-8500
Facsimile: (916) 974-8510
Attorneys for Defendants County Of Sacramento;
Scott Jones, Sheriff; James Lewis; Rick Pattison

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA, SACRAMENTO DIVISION

24 JAMES JOSHUA MAYFIELD; et al.,

25 Plaintiffs,

26 v.

27 IVAN OROZCO; et al.,
28 Defendants.

Case No. 2:13-CV-02499-JAM-AC

**STIPULATION RE: EXTENSION OF
EXPERT DISCOVERY DEADLINES**

Complaint Filed: December 3, 2013
1st Amended Complaint Filed: March 26, 2014
2nd Amended Complaint Filed: March 19, 2015
3rd Amended Complaint Filed: June 22, 2015
Trial Date: May 1, 2017

1 **IT IS HEREBY STIPULATED BY THE PARTIES TO ACTION NO. 2:13-CV-02499-JAM-AC**
2 **AS FOLLOWS:**

3 WHEREAS, on December 3, 2013, plaintiffs James Joshua Mayfield, James Allison Mayfield,
4 Jr. and Terry Mayfield (hereafter, collectively referred to as “plaintiffs”) filed the instant action
5 against defendants Ivan Orozco, Sheriff Scott Jones, James Lewis, Rick Pattison, County of
6 Sacramento, University of California Davis Health System, Dr. Gregory Sokolov, in his individual
7 capacity, and Dr. Robert Hales (hereafter, collectively referred to as “defendants”); and

8 WHEREAS, on April 20, 2015, the court filed its Status (Pretrial Scheduling) Order, in which
9 the court set forth all the operative dates governing scheduling of events in this case. In its order, the
10 court ordered expert disclosures under Federal Rule of Civil Procedure 26(a)(2) to take place by
11 August 12, 2016. Supplemental disclosures and disclosure of rebuttal experts under Federal Rule of
12 Civil Procedure 26(a)(2)(c) were to be made by August 26, 2016. The court further ordered that all
13 discovery, including all depositions, be completed by October 14, 2016; and

14 WHEREAS, the parties to this action have been working diligently to complete discovery, it
15 has come to light that it will be difficult, if not impossible, to complete an independent medical
16 examination (“IME”) of plaintiff James Joshua Mayfield, and complete the disclosure of expert
17 reports, and complete the depositions of experts, by the dates set forth above; and

18 WHEREAS, the parties have met and conferred and have agreed, and hereby stipulate, to an
19 extension of the expert discovery deadlines as follows:

- 20 1. Extend the expert disclosure date from August 12, 2016 to **September 22, 2016;**
- 21 2. Extend the supplemental expert and rebuttal expert disclosure date from August 26,
22 2016 to **October 7, 2016;**
- 23 3. The present discovery cutoff date of October 14, 2016 shall remain in place, except for
24 purposes of depositions of experts only, which shall be continued to the date of **October 26, 2016;**
- 25 4. All other discovery deadlines, and all law and motion and trial dates established
26 previously by the court's pretrial Scheduling Order dated April 20, 2015 shall remain in effect.

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1 It is hereby stipulated, by and between the parties through their respective counsel of record,
2 that the expert discovery deadlines may be extended as set forth above, subject to approval of the
3 court.

4 DATED: June 29, 2016 **WILKE, FLEURY, HOFFELT, GOULD & BIRNEY, LLP**

5 By: // NEAL C. LUTTERMAN
6 NEAL C. LUTTERMAN
7 ROBERT F. TYLER, JR.
8 Attorneys for Defendants
9 REGENTS OF THE UNIVERSITY OF CALIFORNIA,
10 now sued as the UNIVERSITY OF CALIFORNIA DAVIS
11 HEALTH SYSTEM, and DR. GREGORY SOKOLOV,
12 and DR. ROBERT HALES

13 DATED: June 29, 2016 **HADSELL STORMER & RENICK LLP**

14 By: // BARBARA ENLOE HADSELL
15 BARBARA ENLOE HADSELL
16 DAN STORMER
17 JOSH PIOVIA-SCOTT
18 ACRIVI COROMELAS
19 CAITLAN McLOON
20 Attorneys for Plaintiffs
21 JAMES JOSHUA MAYFIELD, JAMES ALLISON
22 MAYFIELD, JR., and TERRI MAYFIELD

23 DATED: June 29, 2016 **RIFKIN LAW OFFICE**

24 By: // LORI RIFKIN
25 LORI RIFKIN
26 Attorneys for Plaintiffs
27 JAMES JOSHUA MAYFIELD, JAMES ALLISON
28 MAYFIELD, JR., and TERRI MAYFIELD

DATED: June 29, 2016 **LONGYEAR, O'DEA & LAVRA, LLP**

By: // VAN LONGYEAR
VAN LONGYEAR
PETER ZILAFF
NICOLE CAHILL
Attorneys for Defendants
COUNTY OF SACRAMENTO; SCOTT JONES,
SHERIFF; JAMES LEWIS; RICK PATTISON

DATED: June 29, 2016 **PORTER SCOTT**

By: // JOHN R. WHITEFLEET
JOHN R. WHITEFLEET
ADAM DEBOW
Attorneys for Defendant
IVAN OROZCO

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ATTESTATION REGARDING SIGNATURES

I, Neal C. Lutterman, hereby attest that all other signatories listed, and on whose behalf the filing is submitted, concur in the filings content and have authorize the filing.

DATED: June 29, 2016

// NEAL C. LUTTERMAN
Neal C. Lutterman

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ORDER OF RE: EXTENSION OF EXPERT DISCOVERY DEADLINES

Based upon the foregoing Stipulation of the parties and good cause appearing, it is hereby ordered that:

- 1. Expert disclosures are now due on **September 22, 2016**;
- 2. Supplemental expert and rebuttal expert disclosures are now due on **October 7, 2016**;
- 3. The present discovery cutoff date of October 14, 2016 shall remain in place, except for purposes of depositions of experts only, which shall be continued to the date of **October 26, 2016**;
- 4. All other discovery deadlines, and all law and motion and trial dates established previously by the court's pretrial Scheduling Order dated April 20, 2015 shall remain in effect.

Dated: 6/29/2016

/s/ John A. Mendez
JOHN A. MENDEZ.
United States District Court Judge