1	RIVERA & ASSOCIATES	
2	2180 Harvard Street, Suite 310 Sacramento, California 95815	
3	Tel: 916-922-1200 Fax: 916 922-1303	
4 5 6	Jesse M. Rivera, SBN 84259 Jonathan B. Paul, SBN 215884 Shanan L. Hewitt, SBN 200168 Jill B. Nathan, SBN, 186136	
7	Attorneys for Defendant, OFFICER D. BUNCH	
9	IN THE UNITED STATES DISTRICT COURT	
10	IN AND FOR THE EASTERN DISTRICT OF CALIFORNIA	
11		
12	BENJAMIN STROMAN) CASE NO. 2:14-cv-00524 WBS CKD
114 115 116 117 118 119 220 221	Plaintiff, vs. VALLEY STATE PRISON WARDEN RON DAVIS IN HIS PERSONAL/INDIVIDUAL CAPACITY, CDCR CORRECTIONS OFFICER S. CLEMENT IN HIS PERSONAL/INDIVIDUAL CAPACITY, CDCR CORRECTIONS OFFICER R. FLEMINGIN HIS PERSONAL/INDIVIDUAL CAPACITY, CDCR CORRECTIONS OFFICER D. BUNCH IN HIS PERSONAL/INDIVIDUAL CAPACITY, and DOES 1 - 100 Defendants.	STIPULATION and ORDER EXTENDING THE EXPERT WITNESS DISCLOSURE SERVICE DEADLINE
23	TO THE COURT, TO ALL PA	RTIES AND THEIR COUNSEL OF RECORD:
24	Plaintiff Benjamin Stroman ("Plaintiff") and Defendants Bunch, Clement, and Davis by	
25	an through their undersigned counsel, hereby stipulate as follows:	
26	That good cause exists to extend the expert witness disclosure service deadline by 45	
27	days to June 15, 2015.	
28	Specifically, the parties stipulate that good cause exists to extend the expert witness	

1	disclosure service deadline from the current date of April 30, 2015 as set forth in the September	
2	26, 2014, Status (Pretrial Scheduling) Order (Doc 29) as the parties have only recently had the	
3	opportunity to take the deposition of Plaintiff Benjamin Stroman on April 28, 2015. The delay	
4	in the setting and taking of Plaintiff's deposition was the result of multiple factors including	
5	delays in obtaining written responses to discovery from Plaintiff; a loss of contact between	
6	Plaintiff and his counsel; and, the recent appearance in the matter of defendant Clement on	
7	February 17, 2015. Hence, the parties stipulate that the expert witness disclosure deadline	
8	should be continued to June 15, 2015.	
9	IT IS SO STIPULATED.	
10		
11	Dated: April 29, 2015	RIVERA & ASSOCIATES
12		/s/ Jonathan B. Paul
13		JONATHAN B. PAUL
14		Attorney for Defendant Bunch
15	Dated: April 29, 2015	LAW OFFICES OF BENJAMIN A. WILLIAMS
16		/s/ Benjamin A. Williams (As Authorized of Today)
17		Benjamin A. Williams, Esq.
18		Attorney for Plaintiff
19	Dated: April 29, 2015	LAW OFFICES OF STEVEN A. GERINGER
20		/s/ Steven A. Geringer (As Authorized of Today)
21		Steven A. Geringer, Esq.
22		Attorney for Defendant Clement
23	Dated: April 29, 2015	CALIFORNIA OFFICE OF ATTORNEY GENERAL
24		/ (TD: CC IV)
25		/s/Tiffany Hixson (As Authorized of Today)
26		Tiffany Hixson Attorney for Defendants R. Davis
27		

28

##