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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

ROBERT BARRON.

Plaintiff,

V.

CITY OF REDDING, BRANDON LARGENT, CHIEF ROBERT F. PAOLETTI, and DOES 1-10.

Defendants.

CASE NO.: 2:14-cv-01107-MCE-CMK

**STIPULATED REQUEST TO MODIFY
SCHEDULING ORDER; ORDER
THEREON**

IT IS HEREBY STIPULATED AND AGREED by and between Plaintiff ROBERT BARRON, and Defendants CITY OF REDDING, BRANDON LARGENT, and CHIEF ROBERT F. PAOLETTI, (collectively, the “Parties”), by and through their undersigned Counsel, pursuant to Local Rules 143 and 144 as follows:

1. The Parties respectfully request the District Court modify the Scheduling Conference Order to allow approximately 40 additional days to complete non-expert discovery based on good cause appearing therefore as more fully set forth below. The Final Pretrial and Trial dates would remain the same.

2. On November 19, 2014 the Court issued its Initial Scheduling Order setting certain dates and deadlines, including discovery cut-offs, dispositive motion hearing deadlines and trial. Dckt. No. 10.

1 3. The Parties seek modification of the dates currently set for the close of non-expert
2 discovery.

3 4. The Parties submit good cause exists to modify the current scheduling order due to
4 counsels' respective schedules, and the remaining voluminous discovery that must be completed. The
5 Parties have met and conferred regarding the discovery issues and deposition scheduling, and have
6 agreed that approximately 40 additional days will be necessary to resolve the pending discovery issues
7 and complete non-expert and expert discovery.

8 5. The Parties submit that the movement of dates will allow counsel to properly complete
9 non-expert discovery. The Parties submit that the proposed modified dates will not affect the Pretrial
10 Scheduling Conference or trial date.

11 8. Therefore, the Parties respectfully submit that good cause exists to amend the Pretrial
12 Scheduling Order dated November 19, 2014, and hereby propose the following schedule for further
13 proceedings:

	<u>Current Date</u>	<u>Proposed Date</u>
<u>Expert Disclosure:</u>	September 2, 2015	Unchanged
<u>Non-Expert Discovery Cutoff:</u>	July 2, 2015	August 14, 2015
<u>Supplemental Expert Disclosure:</u>	September 22, 2015	Unchanged
<u>Expert Discovery Cutoff:</u>	November 13, 2015	Unchanged
<u>Pretrial Motion Filing Deadline:</u>	November 13, 2015	Unchanged
<u>Pretrial Motion Hearing Deadline:</u>	January 7, 2016	Unchanged
<u>Final Pretrial Conference:</u>	March 17, 2016	Unchanged
<u>Trial:</u>	May 2, 2016	Unchanged

23 **IT IS SO STIPULATED, BY AND THROUGH COUNSEL OF RECORD.**

24 Dated: June 3, 2015.

LAW OFFICES OF DALE K. GALIPO

26 By: /s/ Dale K. Galipo
27 Dale K. Galipo, Esq.

1 Dated: June 3, 2015.

LAW OFFICES OF VICKI I. SARMIENTO

2 By: /s/ Vicki I. Sarmiento
3 Vicki I. Sarmiento, Esq.

4 Dated: June 3, 2015.

BRICKWOOD LAW OFFICE

5 By: /s/ Gary Brickwood
6 Gary Brickwood, Esq.

7 Dated: June 3, 2015.

GOYETTE & ASSOCIATES, INC.
A Professional Law Corporation

9 By: /s/ Sean D. O'Dowd
10 Sean D. O'Dowd, Esq.

11 **ORDER**

12 Having reviewed the above stipulation and good cause appearing therefore, IT IS HEREBY
13 ORDERED that the Scheduling Conference Order be modified as follows:

14 Expert Disclosure: September 2, 2015 (Unchanged)

15 Non-Expert Discovery Cutoff: August 14, 2015

16 Supplemental Expert Disclosure: September 22, 2015 (Unchanged)

17 Expert Discovery Cutoff: November 13, 2015 (Unchanged)

18 Pretrial Motion Filing Deadline: November 13, 2015 (Unchanged)

19 Pretrial Motion Hearing Deadline: January 7, 2016 (Unchanged)

20 The Pretrial Conference date of March 17, 2016 at 2:00 p.m. in Courtroom 7, before the
21 Honorable Morrison C. England, Jr., and trial date of May 2, 2016 at 9:00 a.m. in Courtroom 7, before
22 the Honorable Morrison C. England, Jr., remain unchanged.

23 IT IS SO ORDERED.

24 Dated: June 10, 2015

25 
26 MORRISON C. ENGLAND, JR., CHIEF JUDGE
27 UNITED STATES DISTRICT COURT