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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

HILLIARD WILLIAMS,

Plaintiff,

v.

DR. JAROM A. DASZKO, M.D.; DR. DAVID
MATHIS, M.D.; and DOES 1-25, inclusive, in
their individual and official capacities,

Defendants

Case No. 2:14-cv-1248 KJM AC

**JOINT STIPULATION AND
~~PROPOSED~~ ORDER
REGARDING DEADLINE FOR EXPERT
DISCOVERY**

1 **STIPULATION**

2 WHEREAS:

3 (1) The parties in this Section 1983 action anticipate the potential that one or more of the
4 parties will offer expert testimony in this action;

5 (2) On May 2, 2017, the Court issued an Order setting a discovery deadline in this action of
6 August 4, 2017, which did not distinguish between fact and expert discovery;

7 (3) Federal Rule of Civil Procedure 26(a)(2)(D)(i) provides that, absent a stipulation or court
8 order, disclosures of expert testimony must be made at least 90 days before the date set for trial;

9 (4) The Court has not yet set a trial date in this action;

10 (5) In the absence of a court-ordered expert discovery deadline, the parties agree that, for the
11 avoidance of doubt, it is prudent to memorialize their understanding of the deadline for expert discovery
12 in writing;

13 NOW, THEREFORE, IT IS STIPULATED AND AGREED that, until and unless the Court
14 issues an Order setting forth a separate expert discovery deadline, the deadline for disclosures of expert
15 testimony shall be 90 days before the trial date ultimately set by the Court.

16 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

17
18 Dated: August 2, 2017

JENNER & BLOCK LLP

19
20 BY: /s/ L. David Russell
L. David Russell

21 *Pro Bono* Attorneys for Plaintiff
22 HILLIARD WILLIAMS

23 Dated: August 2, 2017

ATTORNEY GENERAL OF CALIFORNIA

24
25 BY: /s/ Joseph R. Wheeler
(as authorized on July 31, 2017)
26 Joseph R. Wheeler

27 Attorneys for Defendant
28 DR. DAVID MATHIS, M.D.

1 Dated: August 2, 2017

ANGELO, KILDAY & KILDUFF, LLP

2
3 BY: /s/ Kevin J. Dehoff
4 (as authorized on August 1, 2017)
Kevin J. Dehoff

5 Attorneys for Defendant
6 DR. JAROM A. DASZKO, M.D.

7
8 **IT IS SO ORDERED.**

9
10 Dated: August 10, 2017

11 
12 _____
13 ALLISON CLAIRE
14 UNITED STATES MAGISTRATE JUDGE