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19	Attorney for Plaintiff JAMES SMITH		
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	UNITED STATE	ES DISTRICT COURT	
21	EASTERN DISTRICT OF CALIFORNIA		
22			
23	JAMES SMITH,) Case No.: 2:14-cv-01318-TLN-AC	
24	Plaintiff,)) JOINT REQUEST TO ENLARGE TIME;	
25) DECLARATION OF AMIE MCTAVISH	
26	vs.) IN SUPPORT THEREOF ; ORDER	
	CITY OF LODI, et al.,)	
27			
28	Defendants.	_)	
	-1-		
	JOINT REQUEST TO) ENLARGE TIME; ORDER	
		Dockets.Justia.com	

1	WHEREAS the deadline for non-expert discovery to be completed in this matter is July		
2	6, 2015;		
3	WHEREAS Plaintiff James Smith has noticed the deposition for the City of Lodi to		
4	produce a person with knowledge as to eleven categories concerning the facility that is the		
5	subject of this litigation;		
6	WHEREAS the person best suited for this deposition, Wally Sandelin, the Public Works		
7	Director for the City of Lodi, cannot be deposed until August 13, 2015 due to scheduling		
8	conflicts;		
9	IT IS HEREBY JOINTLY REQUESTED by Plaintiff, JAMES SMITH, and Defendant,		
10	CITY OF LODI, by and through their undersigned Counsel, as follows:		
11	Enlarge time for discovery to be conducted to allow the deposition of Wally Sandlin to		
12	take place on August 13, 2015.		
13	All other dates in the scheduling order to remain unchanged.		
14	Data de Julie 6 2015		
15	Dated: July 6, 2015 ANGELO, KILDAY & KILDUFF, LLP		
16	/s/ Amie McTavish By:		
17	AMIE McTAVISH KEVIN J. DEHOFF		
18	Attorneys for Defendant		
19	CITY OF LODI		
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21	Dated: July 6, 2015CENTER FOR DISABILITY ACCESS		
22	/s/ Amanda Lockhart (as authorized		
23	on 6/24/15) By:		
24	AMANDA LOCKHART Attorney for Plaintiff JAMES SMITH		
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	-2-		
	JOINT REQUEST TO ENLARGE TIME; ORDER		

1	DECLARATION OF AMIE MCTAVISH		
2	I, Amie McTavish, do hereby declare as follows:		
3	1. I am an attorney at law duly licensed to practice before the Courts of the State of		
4	California and the United States District Court for the Eastern District of California.		
5	2. I am an associate with the law firm of Angelo, Kilday & Kilduff. I am familiar		
6	with the pleadings and discovery in this case.		
7	3. On May 4, 2015 my office received a deposition notice for "The City of Lodi" to		
8	commence on May 27, 2015.		
9	4. The notice sought a deponent knowledgeable in eleven subjects in connection		
10	with the property that is the subject of this litigation.		
11	5. Wally Sandelin, the Public Works Director for the City of Lodi, is the person best		
12	qualified for this deposition.		
13	6. Due to vacations and scheduling conflicts, the May 27 th date was not feasible for		
14	this deposition to take place.		
15	7. The next date Mr. Sandelin and all counsel will be available for deposition is		
16	August 13, 2015.		
17	8. I believe these circumstances establish Good Cause for a minimal modification of		
18	the existing scheduling order.		
19	9. No other modification of the scheduling order is being sought.		
20	I declare under penalty of perjury under the laws of the United States, that the forgoing is		
21	true and correct, that I have personal knowledge of the facts stated above, and that, if sworn as a		
22	witness, I would be competent to testify thereto.		
23	Executed this 23rd day of June 2015, at Sacramento, California.		
24	/s/ Amie McTavish		
25	AMIE McTAVISH		
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	-3- JOINT REQUEST TO ENLARGE TIME; ORDER		

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1	ODDED		
2 3	ORDER IT IS HERERY ORDERED that the enlargement of time for discovery as reflected		
3 4	IT IS HEREBY ORDERED that the enlargement of time for discovery as reflected heretofore is granted.		
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6	Dated: July 6, 2015		
7	wy - Hunley		
8	Troy L. Nunley		
9	United States District Judge		
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	-4- JOINT REQUEST TO ENLARGE TIME; ORDER		