

1 AMIE McTAVISH, ESQ., SB No. 242372

Email: [amctavish@akk-law.com](mailto:amctavish@akk-law.com)

2 KEVIN J. DEHOFF, ESQ., SB No. 252106

Email: [kdehoff@akk-law.com](mailto:kdehoff@akk-law.com)

3 **ANGELO, KILDAY & KILDUFF, LLP**

4 Attorneys at Law

601 University Avenue, Suite 150

5 Sacramento, CA 95825

Telephone: (916) 564-6100

6 Telecopier: (916) 564-6263

7 JANICE D. MAGDICH, ESQ., SB No. 188278

Email: [jmagdich@lodi.gov](mailto:jmagdich@lodi.gov)

8 City Attorney, City of Lodi

9 P.O. Box 3006

10 Lodi, CA 95241

Telephone: (209) 333-6701

11 Fax: (209) 339-0763

12 Attorneys for Defendant CITY OF LODI

13 RAYMOND G. BALLISTER, JR. ESQ., SBN 111282

14 PHYL GRACE, ESQ., SBN 171771

CENTER FOR DISABILITY ACCESS

15 P.O. Box 262490

16 San Diego, CA 92196-2490

9845 Erma Road, Suite 300

17 San Diego, CA 92131

18 isabelm@potterhandy.com

19 Attorney for Plaintiff JAMES SMITH

20 **UNITED STATES DISTRICT COURT**

21 **EASTERN DISTRICT OF CALIFORNIA**

23 JAMES SMITH,

) Case No.: 2:14-cv-01318-TLN-AC

)

24 Plaintiff,

) **JOINT REQUEST TO ENLARGE TIME;**

) **DECLARATION OF AMIE MCTAVISH**

25 vs.

) **IN SUPPORT THEREOF ; ORDER**

)

26 CITY OF LODI, et al.,

)

)

27 Defendants.

)

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  
15 Dated: July 6, 2015

ANGELO, KILDAY & KILDUFF, LLP

16 /s/ Amie McTavish

17 By: \_\_\_\_\_

18 AMIE McTAVISH  
19 KEVIN J. DEHOFF  
20 Attorneys for Defendant  
CITY OF LODI

21 Dated: July 6, 2015

CENTER FOR DISABILITY ACCESS

22 /s/ Amanda Lockhart (as authorized  
23 on 6/24/15)

24 By: \_\_\_\_\_

25 AMANDA LOCKHART  
26 Attorney for Plaintiff JAMES SMITH  
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1. I am an attorney at law duly licensed to practice before the Courts of the State of California and the United States District Court for the Eastern District of California.

3. On May 4, 2015 my office received a deposition notice for “The City of Lodi” to commence on May 27, 2015.

5. Wally Sandelin, the Public Works Director for the City of Lodi, is the person best qualified for this deposition.

7. The next date Mr. Sandelin and all counsel will be available for deposition is August 13, 2015.

9. No other modification of the scheduling order is being sought.

Executed this 23rd day of June 2015, at Sacramento, California.

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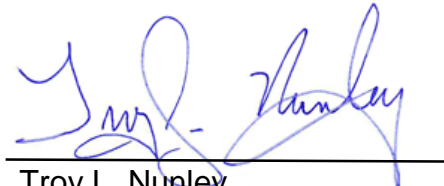
AMIE McTAVISH

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**ORDER**

IT IS HEREBY ORDERED that the enlargement of time for discovery as reflected heretofore is granted.

Dated: July 6, 2015

  
\_\_\_\_\_  
Troy L. Nunley  
United States District Judge