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7 UNITED STATES DISTRICT COURT

8 FOR THE EASTERN DISTRICT OF CALIFORNIA

9 E.R., a minor, by and through his Guardian ad
Litem, CAROLYN YOUNG ,

10 Plaintiff,

11 v.

12 SUTTER DAVIS HOSPITAL, SUTTER WEST
13 WOMEN'S HEALTH, SUSAN MAAYAH,
M.D., and DOES 1 to 100, inclusive,

14 Defendants.
15

Case No. 2:14-CV-02053-WBS-CKD

**STIPULATION AND ORDER
REGARDING EXTENSION OF EXPERT
DISCLOSURE AND DISCOVERY
DEADLINES**

16 AND RELATED CROSS-ACTION.
17

18 THE PARTIES, THROUGH THEIR RESPECTIVE COUNSEL OF RECORD,
19 STIPULATE AS FOLLOWS:

20 Pursuant to Federal Rule of Civil Procedure 16 and this Court's Status (Pretrial Scheduling)
21 Order (ECF 24), the parties hereby stipulate and propose to continue the current dates for initial
22 expert disclosures by approximately forty-five (45) days, as well as the due date for rebuttal expert
23 disclosures and for the completion of discovery, as further set forth below. The parties do not
24 request a continuance of the trial date or of any other dates at this time.

25 The Court previously granted a stipulation and proposed order extending these dates from
26 January 15, 2016, to March 15, 2016. (See Dkt. No. 30). The parties seek this further extension to
27 provide time to complete the core fact discovery needed for expert reports, including the deposition of a
28 witness in Florida on March 30, 2016. Rather than have initial reports and one or more supplements, it

1 is more efficient to extend the due date for expert reports at this time. The parties seek a corresponding
2 continuance for rebuttal reports, and the discovery cut-off, to permit expert depositions in the early fall
3 instead of the late summer in keeping with counsel's respective trial and personal calendars.

4 Thus, the parties hereby stipulate and propose that the current pre-trial dates be revised as
5 follows:

6 Event	Current Date	Proposed Date
7 Expert Disclosures	March 15, 2016	April 29, 2016
8 Rebuttal Expert Disclosures	May 17, 2016	June 3, 2016
9 Discovery Cut-Off	August 26, 2016	October 14, 2016

10 The parties do not request any alteration of other dates at this time, and expect to be able to
11 proceed on the current post-discovery schedule. Because this stipulation does not seek to alter the
12 trial date, it "may be heard and decided by the assigned Magistrate Judge." (ECF 24 at 5:9).

13 Respectfully submitted,

14 Dated: February 29, 2016

BENJAMIN B. WAGNER
United States Attorney

15
16 By: /s/ Gregory T. Broderick
GREGORY T. BRODERICK
Assistant U.S. Attorney

17
18 LA FOLLETTE, JOHNSON,
DE HAAS, FESLER & AMES

19 By: /s/ Larry Thornton (auth 2/29/16)
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23 By: /s/ Kat Todd (auth 2/29/16)
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WOMEN'S HEALTH & SUSAN MAAYAH, M.D.

24
25 RICE & BLOOMFIELD, LLP

26 By: /s/ Linda Fermoyle Rice (auth 2/29/16)
LINDA FERMOYLE RICE
Attorneys for Plaintiff E.R.

1 Good cause appearing, **IT IS SO ORDERED.**

2 Dated: March 3, 2016



CAROLYN K. DELANEY
UNITED STATES MAGISTRATE JUDGE

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