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Attorneys for the United States

UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF CALIFORNIA

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

Plaintiff,

v.

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

Defendants.

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

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

AND RELATED CROSS-ACTION.

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

Pursuant to Federal Rule of Civil Procedure 16 and this Court's Status (Pretrial Scheduling)
Order (ECF 24), the parties hereby stipulate and propose to continue the deadlines for expert
disclosures and rebuttal expert disclosures by 7 days. The parties do not request a continuance of the
discovery cut-off deadline, the trial date, or of any other dates at this time.

The Court previously granted a stipulation and proposed order extending the date for expert
disclosures from January 15, 2016, to March 15, 2016, and extending the date for rebuttal expert
disclosures from March 18, 2016, to May 17, 2016. (Dkt. No. 30). The Court then granted a stipulation
and proposed order extending the date for expert disclosures from March 15, 2016, to April 29, 2016,
extending the date for rebuttal expert disclosures from May 17, 2016, to June 3, 2016, and extending the

discovery cut-off deadline from August 26, 2016, to October 14, 2016.

The parties seek this further extension of the deadlines for expert disclosures and rebuttal expert disclosures because counsel for the United States has been out of the office since April 20, 2016, with an unexpected illness.

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

Event	Current Date	Proposed Date
Expert Disclosures	April 29, 2016	May 6, 2016
Rebuttal Expert Disclosures	June 3, 2016	June 10, 2016

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

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3 Dated: April 25, 2016

Respectfully submitted,

BENJAMIN B. WAGNER
United States Attorney

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

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

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

23 Dated: April 26, 2016

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CAROLYN K. DELANEY
UNITED STATES MAGISTRATE JUDGE