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5 Attorneys for Plaintiff,  
E. R., a minor, by and through his  
6 Guardian ad Litem, Carolyn Young

7 UNITED STATES DISTRICT COURT  
8 EASTERN DISTRICT OF CALIFORNIA  
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E. R., a minor, by and through his  
11 Guardian ad Litem, Carolyn Young, CASE NO: 2:14-2053 WBS CKD

12 Plaintiff,

13 vs.

STIPULATION AND [PROPOSED] ORDER  
REGARDING EXTENSION OF REBUTTAL  
EXPERT DISCLOSURE DEADLINE

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

17 Defendants.

18 AND RELATED CLAIMS.  
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20 THE PARTIES, THROUGH THEIR RESPECTIVE COUNSEL OF RECORD,  
21 STIPULATE AS FOLLOWS:

22 Pursuant to Federal Rule of Civil Procedure 16 and this Court's Status (Pretrial  
23 Scheduling) Order (ECF 24), the parties hereby stipulate and propose to continue the  
24 deadline for rebuttal expert disclosures by 30 days. The parties do not request a  
25 continuance of the discovery cut-off deadline, the trial date, or of any other dates at this  
26 time.

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

4 The Court then granted a stipulation and proposed order extending the date for expert  
5 disclosures from March 15, 2016, to April 29, 2016, extending the date for rebuttal expert  
6 disclosures from May 17, 2016, to June 3, 2016, and extending the discovery cut-off  
7 deadline from August 26, 2016, to October 14, 2016. (Dkt. No. 31)

8 The Court then granted a stipulation and proposed order extending the date for expert  
9 disclosures from April 29, 2016, to May 6, 2016, extending the date for rebuttal expert  
10 disclosures from June 3, 2016, to June 10, 2016. (Dkt. No. 34)

11 The parties seek this further extension of the deadline for rebuttal expert  
12 disclosures because nearly two dozen experts and their reports were exchanged on May  
13 6, 2016, and, due to trial commitments and vacation schedules, additional time is needed  
14 to determine whether and to what extent rebuttal expert disclosures are necessary and to  
15 secure reports from rebuttal experts for the exchange.

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

18	Event	Current Date	Proposed Date
19	Rebuttal Expert Disclosures	June 10, 2016	July 11, 2016

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

24 Respectfully submitted,

25 Dated: May 19, 2016

RICE & BLOOMFIELD, LLP

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*Stip and [Proposed] Order Re: Extension of Rebuttal Expert Disclosure Deadline*

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By: /s/ Linda Fermoyle Rice  
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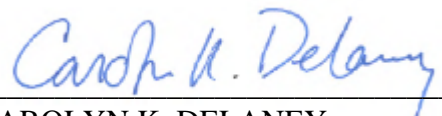
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Attorneys for Defendants SUTTER WEST  
WOMEN'S HEALTH & SUSAN MAAYAH, M.D.

Good cause appearing, IT IS SO ORDERED.

Dated: May 20, 2016

  
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CAROLYN K. DELANEY  
UNITED STATES MAGISTRATE JUDGE