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Attorney for Defendant, 30<sup>th</sup> DISTRICT AGRICULTURAL ASSOCIATION

**UNITED STATES DISTRICT COURT**  
**EASTERN DISTRICT OF CALIFORNIA**

RICHARD HAMMOND ,

CASE NO.: 2:15-CV-0068-TLN-CMK

Plaintiff,

**JOINT STIPULATION AND ORDER TO  
EXTEND TIME FOR EXPERT  
DISCLOSURES AND REBUTTAL  
DEADLINE**

v.

COUNTY OF TEHAMA; 30<sup>TH</sup> DISTRICT  
AGRICULTURAL ASSOCIATION, a state  
institution of the State of California and DOES  
1-10, inclusive.

Complaint Filed: 1/12/2015

Defendants.

WHEREAS, Defendant 30TH DISTRICT AGRICULTURAL ASSOCIATION (“30TH DAA), Defendant RED BLUFF ROUND UP ASSOCIATION and Plaintiff RICHARD HAMMOND (“HAMMOND”) by and through their respective counsel of record hereby agree as follows:

1. WHEREAS, on or about January 12, 2015, HAMMOND filed his original Complaint;
2. WHEREAS, on or about April 10, 2015, the parties agreed to participate in the Voluntary Dispute Resolution Program (“VDRP”). The parties could not reach an agreement;
3. WHEREAS, on October 22, 2015, the parties filed a Joint Scheduling Report;
4. WHEREAS, on December 7, 2015, the Court entered its Pre-Trial Scheduling Order;

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- 5. WHEREAS, the parties have been engaged in discovery in the above-captioned action, including written discovery, production of documents, and depositions;
- 6. WHEREAS, the parties have stipulated to extend the time for Defendant RED BLUFF ROUND-UP ASSOCIATION to file and serve a responsive pleading to September 29, 2016
- 7. WHEREAS, on September 29, 2016 Defendant RED BLUFF ROUND-UP ASSOCIATION filed and served its answer to Plaintiff's Amended Complaint.
- 8. WHEREAS, this case is set for trial on May 8, 2017;
- 9. WHEREAS, the parties continue to engage in discovery;
- 10. WHEREAS, the Expert Discovery deadline has been continued to November 30, 2016.
- 11. WHEREAS, the parties submit there is good cause to continue the expert disclosure deadlines identified herein by approximately 30 days to allow parties to complete remaining discovery in this matter;
- 12. WHEREAS, the parties are not seeking a continuance of the trial date in this matter by this stipulation.

**STIPULATION:**

NOW THEREFORE, it is agreed and stipulated by and between the parties, through their respective counsel of record, that the following dates previously set by order of the Court be continued as follows: The Parties have conferred and agree to continue the following deadlines:

- 1. Expert disclosure date for 34 days, from October 11, 2016 to November 14, 2016 and the rebuttal reports 30 days, from October 31, 2016 to November 30, 2016;
- 2. The deadline for completion of expert discovery from November 30, 2016, to January 7, 2017; and
- 3. The deadline for dispositive motions from January 12, 2017 to January 25, 2017.

The parties have good cause to request an extension for the expert disclosure deadline because the discovery process was delayed due to the late addition of Defendant Red Bluff Roundup to this case. The Parties wish to postpone the expert disclosures briefly. The Parties

1 stipulate to extend the expert disclosure date to November 14, 2016. Accordingly, the time for the  
2 rebuttal reports will need to be extended as well. The amended schedule comports with the Federal  
3 Requirement that disclosures be made 90 days before trial. Fed. R. Civ. P. 26(a)(2)(D). Trial is  
4 presently scheduled for May 8, 2017.

5 The parties further stipulate that the entry of an order extending the time for expert  
6 disclosure shall not impair the ability of Defendant Red Bluff Roundup in filing a motion to vacate  
7 and re-set the present trial date.

8  
9 Respectfully submitted,  
10 Dated: October 7, 2016 CENTER FOR DISABILITY ACCESS

11  
12 By /s/ Phyl Grace (Authorized 10/07/16)  
13 Phyl Grace  
14 Attorney for Plaintiff  
15 RICHARD HAMMOND

16 Dated: October 7, 2016 McCARTHY & RUBRIGHT, LLP

17  
18 By /s/ Thomas Patrick Jr., (Authorized 10/07/16)  
19 Thomas Patrick Jr.,  
20 Attorney for Defendant  
21 RED BLUFF ROUND-UP ASSN

22  
23 Dated: October 17, 2016 PORTER SCOTT  
24 A PROFESSIONAL CORPORATION

25  
26 By /s/ Stephen E. Horan  
27 Stephen E. Horan  
28 Attorney for Defendant  
30th DISTRICT AGRICULTURAL  
ASSOCIATION

