

1 JOHN L. BURRIS, State Bar No. 69888
DEWITT M. LACY, State Bar No. 258789
The Law Offices of John L. Burris
2 7677 Oakport Street, Suite 1120
Oakland, CA 94621
3 Telephone: (510) 839-5200
Facsimile: (510) 839-3882

4 Attorneys for Plaintiffs

5 JOHN M. LUEBBERKE, City Attorney
State Bar No. 164893
6 JAMES F. WILSON, Deputy City Attorney
State Bar No. 107289
7 TED DANIEL WOOD, Deputy City Attorney
State Bar No. 191768
8 425 N. El Dorado Street, 2nd Floor
9 Stockton, CA 95202
Telephone: (209) 937-8333
10 Facsimile: (209) 937-8898

11 Attorneys for Defendants

ROBERT JOHNSON, WILLIAM KAMBIC, DANA MOSHER, and RYAN MORRIS

12 UNITED STATES DISTRICT COURT

13 EASTERN DISTRICT OF CALIFORNIA

14 SYLVIA HAYNES, et al.,) Case No. 2:15-CV-00565-WBS-CKD
15)
Plaintiffs,)
16) **STIPULATION AND ORDER FOR**
vs.) **CONTINUANCE OF PRETRIAL**
17) **SCHEDULING ORDER DEADLINES,**
) **INCLUDING TRIAL**
18)
ROBERT JOHNSON, et al.,)
19)
Defendants.) Assigned: Hon. William B. Shubb
) Assigned: Hon. Carolyn K. Delaney, United States
20) Magistrate Judge
) Complaint Filed: March 13, 2015
) Trial Date: November 8, 2016

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22 IT IS HEREBY STIPULATED by and between Plaintiffs SYLVIA HAYNES,
23 individually and as successor-in-interest to Decedent DONALD RAY HAYNES;
24 ANNTIONETT HAYNES, individually; THE ESTATE OF DONALD RAY HAYNES, and
25 Defendants ROBERT JOHNSON, WILLIAM KAMBIC, DANA MOSHER, and
26 RYAN MORRIS, by and through their counsel of record, DeWitt Lacy, Law Offices of John
27 Burris; and Defendants, City of Stockton, et al., by and through attorneys of record, Ted Wood,
28 Office of the City Attorney, that the following deadlines be continued:

1	Non-expert Discovery Completion	September 6, 2016 (Prior date was June 6, 2016)
2	Expert Disclosures	August 1, 2016 (Prior date was April 25, 2016)
3	Rebuttal Expert Disclosure	August 21, 2016 (Prior date was May 20, 2016)
4	Expert Discovery Completion	October 18, 2016 (Prior date was June 6, 2016)
5	Motion Hearing Schedule (for filing)	December 19, 2016 (Prior date was June 24, 2016)
6	Final Pretrial Conference	February 27, 2017 at 9:00 a.m.
7		(Prior date was September 12, 2016)
8	Jury Trial	April 25, 2017 at 9:00 a.m.
9		(Prior date was November 8, 2016)

10 The brief continuance is requested to permit counsel for Plaintiffs to file and have heard a
 11 motion to withdraw as counsel and to permit Plaintiffs the opportunity to either secure new
 12 counsel or prepare to try their case *in pro per*. The continuance is also requested as there remain
 13 several outstanding discovery issues that will need to be addressed following counsel's motion to
 14 withdraw. The parties respectfully request the Court grant this stipulation to allow them adequate
 15 time to prepare the case for trial.

16 **IT IS SO STIPULATED.**

17 Dated: May31, 2016

JOHN M. LUEBBERKE
 CITY ATTORNEY

19 BY /s/ Ted Daniel Wood
 TED DANIEL WOOD
 Deputy City Attorney
 Attorneys for Defendants
 CITY OF STOCKTON, et al.

23 Dated: May 31, 2016

LAW OFFICES OF JOHN L. BURRIS

25 By /s/ Dewitt M. Lacy
 DEWITT M. LACY
 Attorneys for Plaintiffs

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3 **ORDER**

4 In accordance with the parties' stipulation, and good cause appearing, the deadline for the
5 completion of discovery, expert discovery, the motion hearing schedule, the final pretrial
6 conference, and the trial date specified above are continued with the foregoing request.

7 IT IS SO ORDERED.

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Dated: June 17, 2016



10 **WILLIAM B. SHUBB**
11 **UNITED STATES DISTRICT JUDGE**

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