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7 Attorneys for Plaintiffs
SYLVIA HAYNES
8 ANNTIONETT HAYNES

10 UNITED STATES DISTRICT COURT
11 EASTERN DISTRICT OF CALIFORNIA

13 SYLVIA HAYNES, successor-in-interest
to Donald Ray Haynes, ANNTIONETT
14 HAYNES, individually; THE ESTATE OF
DONALD RAY HAYNES

15 Plaintiffs,

16 v.

17 ROBERT JOHNSON, individually and in
18 his official capacity as a police officer for
the City of Stockton Police Department;
19 WILLIAM KAMBIC, individually and in
his official capacity as a police officer for
20 the City of Stockton Police Department;
DANA MOSHER, individually; RYAN
21 MORRIS, individually and in his official
capacity as a police officer for the City of
22 Stockton Police Department; and DOES 1-
25, inclusive, individually, jointly and
23 severally,

24 Defendants.

Case No. 2:15-cv-00565-WBS-CKD

**STIPULATION & [PROPOSED] ORDER
TO EXTEND DISCOVERY DEADLINES
& TRIAL DATE**

25 **IT IS HEREBY STIPULATED BY AND BETWEEN THE PARTIES, through**
26 **their attorneys of record:**
27

1 WHEREAS, both parties temporarily discontinued discovery efforts while the Court
2 decided on counsel for Plaintiffs' motion to withdraw as attorney of record;

3 WHEREAS, neither party has completed discovery in this matter;

4 WHEREAS, neither party has designated experts in the matter;

5 WHEREAS, the deadline for fact discovery has lapsed;

6 WHEREAS, the deadline for expert discovery will lapse in one day;

7 WHEREAS, trial and pre-trial dates will need to be moved to accommodate the
8 remaining discovery efforts;

9
10 The parties jointly request that the discovery deadlines be extended, as follows:

	<u>Old</u>	<u>New</u>	
11			
12	Expert Disclosures	08/01/16	12/19/16
13	Rebuttal Expert Disclosures	08/21/16	01/06/17
14	Fact Discovery Deadline	09/06/16	01/24/17
15	Expert Discovery Deadline	10/18/16	02/28/17
16	Pre-Trial Conference	02/27/17	07/06/17
17	Trial	04/25/17	09/05/17

18 Dated: October 17, 2016

LAW OFFICES OF JOHN L. BURRIS

19 By: /s/ DeWitt M. Lacy
DeWitt M. Lacy
Attorney(s) for Plaintiffs

20
21 Dated: October 17, 2016

Stockton City Attorney's Office

22 By: */s/
James F. Wilson
City Attorney
23
24 *Mr. Wilson provided consent that this
document be electronically filed.

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ORDER

IT IS SO ORDERED that the current discovery deadlines are extended in accordance with the schedule set forth in the table below:

	<u>Old</u>	<u>New</u>
Expert Disclosures	08/01/16	12/19/16
Rebuttal Expert Disclosures	08/21/16	01/06/17
Fact Discovery Deadline	09/06/16	01/24/17
Expert Discovery Deadline	10/18/16	02/28/17
Pre-Trial Conference	02/27/17	<u>07/03/17 at 1:30 p.m.</u>
Trial	04/25/17	<u>09/06/17 at 9:00 a.m.</u>

Dated: October 17, 2016



WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE