

1 JOHN L. BURRIS, Esq. (SBN 69888)
 DeWITT M. LACY, Esq. (SBN 258789)
 2 **THE LAW OFFICES OF JOHN L. BURRIS**
 Airport Corporate Centre
 3 7677 Oakport Street, Suite 1120
 4 Oakland, California 94621
 Telephone: (510) 839-5200
 5 Facsimile: (510) 839-3882
 john.burris@johnburrislaw.com
 6 dewitt.lacy@johnburrislaw.com

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-
 23 25, inclusive, individually, jointly and
 severally,

24 Defendants.

No. 2:15-cv-00565-WBS-DB

**STIPULATION AND ORDER TO
 EXTEND EXPERT DISCOVERY
 DEADLINE**

The Law Offices of John L. Burris

7677 Oakport Street, Suite 1120
 Oakland, California 94621
 Telephone: (510) 839-5200

27

1 **IT IS HEREBY STIPULATED BY AND BETWEEN THE PARTIES, through**
2 **their attorneys of record:**

3 WHEREAS, trial has been set for November 11, 2017 (dkt. 37);

4 WHEREAS, the expert discovery deadline is set for April 28, 2017 (dkt. 37);

5 WHEREAS, a settlement conference has been set for June 14, 2017 (dkt. 59);

6 WHEREAS, Plaintiff's Expert Ernie Burwell is out of the country and unavailable for
7 deposition prior to the expert discovery deadline;

8 WHEREAS, Plaintiffs' counsel will require additional time to depose Defendants
9 experts Emily Keram, Anthony Lukin, Brad Smith, Thomas Almeida, and Robert Lawrence;

10 WHEREAS, Counsel for all parties agree that it is in the interests of judicial economy
11 and justice, all would benefit from a 30 day extension of the discovery deadline to May 30,
12 2017;

13 The parties respectfully request the earliest available date to conduct a settlement
14 conference on Judge Barnes calendar.

15 **SO STIPULATED.**

16 Dated: April 13, 2017

LAW OFFICES OF JOHN L. BURRIS

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

20 Dated: April 13, 2017

COTA COLE LLP

21 By: */s/
22 Ronald Scholar
23 *Mr. Scholar provided consent that this
24 document be electronically filed.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

ORDER

Pursuant to the stipulation of the parties IT IS HEREBY ORDERED that the expert discovery deadline is continued to May 30, 2017.

DATED: April 20, 2017

/s/ DEBORAH BARNES
UNITED STATES MAGISTRATE JUDGE

DLB:6
DB/orders/orders.civil/hayes0565.stip.eot.ord