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 9 SCHAUMLEFFEL

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IN THE UNITED STATES DISTRICT COURT
 FOR THE EASTERN DISTRICT OF CALIFORNIA – SACRAMENTO DIVISION

11 W.C. BY AND THROUGH HIS MOTHER,
 12 C.M.,

13 Plaintiff(s),

14 v.

15 PLACER HILLS UNION SCHOOL DISTRICT,
 16 STEVE SCHAUMLEFFEL,

17 Defendant(s).

Case No.: 2:15-cv-00716-TLN-CKD

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

*Magistrate Judge Carolyn K. Delaney
 Complaint Filed: March 30, 2015
 1st Amend. Comp. Filed: June 8, 2015
 Trial Date: May 15, 2017*

18 THE PARTIES TO THIS MATTER by and through their respective attorneys of record
 19 herein, do hereby stipulate and agree that the expert witness disclosure deadline of August 30,
 20 2016 be extended to September 30, 2016, and the supplemental expert disclosure deadline of
 21 September 20, 2016 be extended to October 20, 2016. The basis for the extension is as follows:

22 1. The parties have stipulated to an Independent Psychiatric Examination of plaintiff
 23 W.C. to be conducted by Dr. Anlee Kuo, MD. The date set for the Independent Psychiatric
 24 Examination, by agreement of the parties, is August 24, 2016. Additionally, plaintiff plans to
 25 complete non-expert, person most knowledgeable depositions by August 30, 2016, pursuant to a
 26 prior, stipulated order of this court. The present expert designation date does not permit Dr. Kuo
 27 an adequate period of time to report on her Independent Psychiatric Examination and, if necessary,
 28 on the results of the non-expert depositions.

1 2. Dispositive motions must be heard by December 8, 2016, and the trial date is May
2 15, 2017.

3 3. Therefore, the parties' proposed new expert discovery deadlines do not interfere
4 with the timing of dispositive motions or trial.

5 4. The parties previously sought and obtained by stipulation dated February 12, 2016,
6 a continuance of the trial date due to the scheduled vacation of defendant STEVE
7 SCHUAMLEFFEL, along with the extension of other deadlines, including expert discovery. The
8 Court approved the stipulation on February 19, 2016 and ordered the trial continuance and
9 corresponding extensions to the dates set forth above.

10 5. The parties also previously sought and obtained by stipulation dated June 23, 2016,
11 a continuance of the non-expert discovery deadline due to difficulties in timely scheduling the
12 deposition of persons most knowledgeable at defendant School District. The Court approved that
13 stipulation on June 24, 2016, and ordered the extension of the non-expert discovery deadline from
14 June 27, 2016 to August 30, 2016. The deadlines for disclosure of expert witnesses and
15 supplemental expert disclosure were unaffected by that stipulation.

16 6. The extension requested will not delay the trial or impact any other deadlines
17 presently set in this action.

18 IT IS SO STIPULATED.

19 Dated: August 15, 2016

LEIGH LAW GROUP

21 By: /S/ Jay T. Jambeck
22 JAY T. JAMBECK, Attorneys for Plaintiff,
23 W.C. by and through his mother C.M.

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1 IT IS SO STIPULATED.

2 Dated: August ____, 2016

JACOBSON, HANSEN & McQUILLAN

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By: /S/ Leith B. Hansen

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LEITH B. HANSEN, Attorneys for
Defendants, PLACER HILLS UNION
SCHOOL DISTRICT and STEVE
SCHAUMLEFFEL

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ORDER

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IT IS HEREBY ORDERED that the expert discovery deadline shall be extended to
10 September 30, 2016 and the deadline for supplemental expert disclosure shall be extended to
11 October 20, 2016 for the reasons set forth in the accompanying stipulation.

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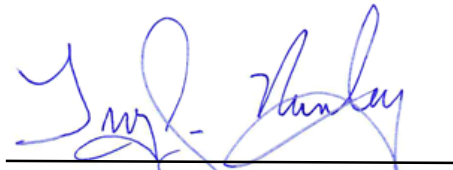
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Dated: August 16, 2016

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Troy L. Nunley
United States District Judge

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