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16 Attorneys for PLAINTIFF,  
 17 *SALVADOR SHANNON, an individual*

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

21 SALVADOR SHANNON, as an individual  
 and as a successor in interest to RYAN  
 22 SHANNON,

23 Plaintiff,

24 vs.

25 COUNTY OF SACRAMENTO, a  
 government entity, TIMOTHY JONES, an  
 26 individual; and JOSEPH REEVE, an  
 individual,

27 Defendants.  
 28

No.: 2:15-CV-00967 KJM DB

**STIPULATION TO ALLOW  
 DEFENDANTS' DESIGNATION OF A  
 REPLACEMENT POLICE PRACTICES /  
 USE OF FORCE EXPERT; ORDER  
 THEREON**

1  
2 WHEREAS, pursuant to the modified scheduling order of November 3, 2016 (Doc. 58),  
3 defendants disclosed their expert witnesses in this case on July 3, 2017, including police practices  
4 / use of force expert Joe Callanan of Callanan & Associates;

5 WHEREAS Mr. Callanan notified defense counsel in December 2020 of his need to  
6 withdraw from this case for medical reasons (see attached **Exhibit A**);

7 WHEREAS defendants began to search for a replacement police practices / use of force  
8 expert;

9 WHEREAS, while defendants were searching for a replacement police practices / use of  
10 force expert, the parties were referred to a settlement conference set for June 24, 2021;

11 WHEREAS the settlement conference was unsuccessful;

12 WHEREAS defendants then retained a replacement police practices /use of force expert,  
13 David M. Blake, who completed a written report on July 13, 2021;

14 WHEREAS on July 15, 2021, defense counsel initiated a meet and confer with plaintiff's  
15 counsel regarding defendants' proposed designation of Mr. Blake as a replacement expert for Mr.  
16 Callanan;

17 WHEREAS on July 29, 2021, plaintiff's counsel stated that they would not oppose the  
18 designation of Mr. Blake as a replacement expert, if defendants would pay Mr. Blake's fee for  
19 two hours of deposition and cover the cost of plaintiff's copy of the deposition transcript;

20 WHEREAS, defendants agree to plaintiff's proposal;

21  
22 THEREFORE, the parties now hereby stipulate, through their counsel of record, as  
23 follows:

24 1. Defendants shall be permitted to designate David M. Blake as their police  
25 practices /use of force expert in place of Joe Callanan, by filing the proposed Defendants'  
26 Disclosure of Replacement Police Practices / Use of Force Expert Witness Information (attached  
27 hereto as **Exhibit B**);

28 2. Defendants will pay for up to two hours of Mr. Blake's time at deposition and will

1 also pay for plaintiff's copy of the deposition transcript.

2 IT IS SO STIPULATED.

3  
4 DATE: August 5, 2021

RIVERA HEWITT PAUL LLP

5  
6 /s/ Wendy Motooka

JONATHAN B. PAUL

7 WENDY MOTOOKA

8 Attorneys for Defendants TIMOTHY JONES and  
JOSEPH REEVE

9  
10 Dated: August 4, 2021

/s/ Gary W. Gorski (as authorized on 8-4-21)

11 Gary W. Gorski

12 Attorney for Plaintiff

13  
14  
15 **ORDER**

16 After considering the Stipulation by and between the parties through their counsel of  
17 record and good cause appearing, IT IS HEREBY ORDERED THAT:

18 1. Defendants shall be permitted to designate David M. Blake as their replacement  
19 police practices / use of force expert for Joe Callanan;

20 2. Defendants shall file their Disclosure of Replacement Police Practices / Use of  
21 Force Expert Witness Information within ten days of the entry of this order; and

22 3. Defendants shall pay Mr. Blake's hourly fee for up to two hours of deposition  
23 testimony and shall pay for plaintiff's copy of the deposition transcript.

24 **IT IS SO ORDERED.**

25 DATE: August 17, 2021.

26  
27   
28 \_\_\_\_\_  
CHIEF UNITED STATES DISTRICT JUDGE