

1 **GARY W. GORSKI (SBN 166526)**  
 2 **LAW OFFICES OF GARY W. GORSKI**  
 3 3017 DOUGLAS BLVD. SUITE 150  
 4 ROSEVILLE, CA 95661  
 5 916-758-1100  
 6 CIVILRIGHTSATTORNEY@OUTLOOK.COM  
 7 WWW.LONEWOLFLAW.COM

8 **DANIEL M. KARALASH (SBN 176422)**  
 9 **STRATEGIC LAW COMMAND**  
 10 3017 DOUGLAS BLVD. SUITE 150  
 11 ROSEVILLE, CA 95661  
 12 (916) 787-1234  
 13 DAN@STRATLAW.ORG  
 14 WWW.STRATLAW.COM  
 15 Attorneys for PLAINTIFF,  
 16 *SALVADOR SHANNON, an individual*

17 RIVERA HEWITT PAUL LLP  
 18 JONTHAN B. PAUL, SBN 215884  
 19 WENDY MOTOOKA, SBN 233589  
 20 11341 Gold Express Drive, Suite 160  
 21 Gold River, CA 95670  
 22 Tel: 916-922-1200 Fax: 916 922-1303  
 23 Email: [JPaul@rhplawyers.com](mailto:JPaul@rhplawyers.com)  
 24 [wmotooka@rhplawyers.com](mailto:wmotooka@rhplawyers.com)  
 25 Attorneys for Defendants TIMOTHY JONES and  
 26 JOSEPH REEVE

17  
 18 **UNITED STATES DISTRICT COURT**  
 19 **EASTERN DISTRICT OF CALIFORNIA**

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

23 Plaintiff,

24 vs.

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

Defendants.

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

**STIPULATION TO CONTINUE FINAL  
 PRE-TRIAL CONFERENCE; ORDER  
 THEREON**

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  
28

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

WHEREAS on August 17, 2021 at docket entry #131, a STIPULATION and ORDER was signed by Chief District Judge Kimberly J. Mueller on 8/17/2021 ORDERING that Defendants shall be permitted to designate David M. Blake as their replacement police practices / use of force expert for Joe Callanan, subject to the conditions stipulated to by the parties;

WHEREAS on August 27, 2021, defendants filed their DESIGNATION/DISCLOSURE of EXPERT WITNESS by Timothy Jones, Joseph Reeve.

WHEREAS the parties met and conferred on available deposition dates, and agreed upon November 17, 2021 being the expert’s deposition date.

WHEREAS at the time the parties agreed upon a date, there was no trial date or pre-trial conference scheduled.

WHEREAS on September 22, 2021, this Court issued a minute order stating that a “Final Pretrial Conference is SET for 10/29/2021,” with a Joint Pretrial Statement due by October 8, 2021 (Doc. 133).

WHEREAS the Court’s Pretrial Scheduling Order (Doc. 54) requires the parties, in the Joint Pretrial Statement, to jointly list undisputed and disputed core facts that are relevant to each claim.

WHEREAS on September 30, 2021, the parties met and conferred to prepare the Joint Pretrial Statement, and concluded that the undisputed and disputed core facts cannot fully be determined until the replacement expert has been deposed;

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

1. That the Final Pretrial Conference be continued for at least 60 days after November 17, 2021, the date of the expert’s deposition previously scheduled; and
2. That the time for filing the Joint Pretrial Statement be extended to 21 days prior to the continued Final Pretrial Conference date.

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  
28

IT IS SO STIPULATED.

DATE: October 5, 2021

RIVERA HEWITT PAUL LLP

/s/ Wendy Motooka  
JONATHAN B. PAUL  
WENDY MOTOOKA  
Attorneys for Defendants TIMOTHY JONES and  
JOSEPH REEVE

Dated: October 5, 2021

/s/ Gary W. Gorski  
Gary W. Gorski  
Attorney for Plaintiff

**ORDER**


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

1. The Final Pretrial Conference set for October 29, 2021 is vacated and rescheduled for February 11, 2022, which is at least 60 days after the date of the expert witness' deposition; and

2. That the parties' time to file the Joint Pretrial Statement shall be continued to January 21, 2022.

**IT IS SO ORDERED.**

DATED: October 5, 2021.

  
\_\_\_\_\_  
CHIEF UNITED STATES DISTRICT JUDGE