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15 **UNITED STATES DISTRICT COURT**  
 16 **EASTERN DISTRICT OF CALIFORNIA**

18 SALVADOR SHANNON, as an individual  
 and as a successor in interest to RYAN  
 19 SHANNON,

20 Plaintiff,

21 vs.

22 COUNTY OF SACRAMENTO, a  
 government entity, TIMOTHY JONES, an  
 23 individual; and JOSEPH REEVE, an  
 individual,

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

**STIPULATION TO MODIFY  
 SCHEDULING ORDER;  
 THEREON ORDER**

26 WHEREAS on November 24, 2014 an action was commenced in the Superior Court of  
 27 the State of California in and for the County of Sacramento, entitled Salvador Shannon, Plaintiff,  
 28 v. County of Sacramento, DOES 1 to 20, Defendants, Case No. 34-2014-00172136;

1 WHEREAS Plaintiff's complaint was removed to this Court by Defendants pursuant to 28  
2 U.S.C. § 1441(a);

3 WHEREAS on May 11, 2016, Plaintiff filed a Fifth Amended Complaint;

4 WHEREAS on June 1, 2016, Defendants answered the complaint;

5 WHEREAS the Court's scheduling order was entered on June 6, 2016;

6 WHEREAS pursuant to the Court's scheduling order discovery is to be completed by  
7 January 13, 2017;

8 WHEREAS on July 28, 2016, Defendants served Plaintiff with Requests for Production  
9 and Interrogatories;

10 WHEREAS Plaintiff's responses were due on September 2, 2016;

11 WHEREAS in early to mid-September, Plaintiff's counsel's office suffered unexpected  
12 turnover such that the responses to Defendants' discovery were not completed and responsive  
13 documents were not requested;

14 WHEREAS as of the date of this stipulation, Defendants have not received documents  
15 responsive to eight (8) of their fourteen (14) production requests;

16 WHEREAS as of the date of this stipulation, Defendants have not received any documents  
17 related to Decedent or Plaintiff's mental health providers;

18 WHEREAS Plaintiff intends to comply with his discovery obligations but needs  
19 additional time to locate responsive information;

20 WHEREAS Defendants' discovery plan has been hindered due to not receiving responses  
21 to its discovery;

22 WHEREAS Defendants intend to subpoena medical and mental health records;

23 WHEREAS Defendants intend to subpoena decedent's military records, and this process  
24 can take as long as ten (10) weeks;

25 WHEREAS the parties, in order to avoid unnecessary motions practice, and good cause  
26 appearing, desire to stipulate to a modification of the scheduling order;

27 THEREFORE, the parties hereby stipulate, by and through their counsel of record, as  
28 follows:

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1. That the current scheduling order be modified to extend fact discovery for an additional six (6) months past the current cut-off date of January 13, 2017;

2. That all other dates in the pretrial scheduling order be extended by six (6) months or as would be convenient to the Court while allowing Defendants six additional months to complete fact discovery.

IT IS SO STIPULATED.

DATE: October 14, 2016

CREGGER & CHALFANT LLP

/s/ Jordan K. Dixon  
ROBERT L. CHALFANT  
WENDY MOTOOKA  
Attorneys for Defendants  
COUNTY OF SACRAMENTO, TIMOTHY  
JONES, and JOSEPH REEVE

Date: October 14, 2016

LUCERO LAW FIRM

/s/ Steve Lucero  
STEVE LUCERO  
Attorney for Plaintiff SALVADOR SHANNON

1 **ORDER**

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

- 4 1. The scheduling order entered on June 6, 2016, is hereby modified as follows:
- 5 a. The deadline for fact discovery, previously set for January 13, 2017, is VACATED  
6 and RESET for May 15, 2017.
  - 7 b. The deadline for expert disclosures, previously set for March 1, 2017 is  
8 VACATED and RESET for July 3, 2017.
  - 9 c. The deadline for supplemental disclosures of expert witnesses, previously set for  
10 April 17, 2017, is VACATED and RESET for August 17, 2017.
  - 11 d. The deadline for expert discovery, previously set for June 2, 2017, is VACATED  
12 and RESET for October 3, 2017.
  - 13 e. The last day to hear dispositive motions, previously set for July 14, 2017, is  
14 VACATED and RESET for November 17, 2017.
  - 15 f. The deadline for the parties' joint pretrial statement, previously set for October 27,  
16 2017, is VACATED and RESET for March 2, 2018.
  - 17 g. The final pretrial conference, previously set for November 17, 2017 at 10:00 a.m.,  
18 is VACATED and RESET for March 23, 2018.
  - 19 h. The deadline for trial briefs, previously set for December 22, 2017, is VACATED  
20 and RESET for April 23, 2018.
  - 21 i. The jury trial date, previously set for January 8, 2018 at 9:00 a.m., is VACATED  
22 and RESET for May 7, 2018.

23 **IT IS SO ORDERED.**

24 DATE: November 2, 2016

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27 UNITED STATES DISTRICT JUDGE  
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