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19 Attorneys for Defendants COUNTY OF
20 SACRAMENTO, TIMOTHY JONES,
21 and JOSEPH REEVE

22 **UNITED STATES DISTRICT COURT**
23 **EASTERN DISTRICT OF CALIFORNIA**

24 SALVADOR SHANNON, an
25 individual,

26 Plaintiff,

27 v.

28 SACRAMENTO COUNTY, a
government entity; TIMOTHY
JONES, an individual; and JOSEPH
REEVE, an individual,

Defendant.

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

**STIPULATION AND ORDER
MODIFYING SCHEDULING ORDER**

TO THE ABOVE-ENTITLED COURT:

The parties, by and through their attorneys of record, jointly request that the Court modify the current scheduling order as set forth herein.

WHEREAS on November 24, 2014 an action was commenced in the Superior Court of the State of California in and for the County of Sacramento, entitled

1 Salvador Shannon, Plaintiff, v. County of Sacramento, DOES 1 to 20, Defendants,
2 Case No. 34-2014-00172136;

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

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

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

7 WHEREAS the Court's scheduling order was entered on June 7, 2016, and
8 modified once by stipulated order on November 3, 2016;

9 WHEREAS pursuant to the current scheduling order, fact discovery is to be
10 completed by May 15, 2017;

11 WHEREAS the parties previously had the depositions of the Defendants and
12 five other officers scheduled to take place on March 15, 16, and 17, 2017;

13 WHEREAS during the week preceding these depositions, counsel for Plaintiff
14 learned of a last minute trial conflict that caused him to have to postpone these
15 depositions;

16 WHEREAS the parties have been able to reschedule most, but not all, of the
17 depositions within the time remaining for fact discovery;

18 WHEREAS the parties anticipate being able to complete all of the depositions
19 by May 19, 2017;

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

3 1. That the current scheduling order be modified to extend fact discovery
4 to May 19, 2017, an additional five (5) days past the current cut-off date of May 15,
5 2017;

6 2. That all other dates in the pretrial scheduling order remain unchanged.

7 **IT IS SO STIPULATED AND REQUESTED BY THE PARTIES.**

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DATED: March 24, 2017 **LUCERO LAW FIRM, APC**

By: /s/ Estevan R. Lucero
Attorney for Plaintiff,
Gabriel Napier, by and through his
guardian ad litem, Lilly Quiroz
E-mail: steve@luceroLawfirm.com

DATED: March 24, 2017 **CREGGER & CHALFANT LLP**

By: /s/ Wendy Motooka
Attorneys for Defendants County of
Sacramento, Joseph Reeve, and Timothy
Jones
E-mail: wm@creggerlaw.com

ORDER

Pursuant to the parties' stipulation, (ECF No. 69), IT IS HEREBY ORDERED THAT the deadline for fact discovery, previously set for May 15, 2017, is VACATED and RESET for May 19, 2017, with all other dates in the scheduling order entered on November 3, 2016 remaining unchanged.

Dated: April 4, 2017



DEBORAH BARNES
UNITED STATES MAGISTRATE JUDGE

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