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13
 14 UNITED STATES DISTRICT COURT
 15 EASTERN DISTRICT OF CALIFORNIA

16 DUANE BEECHAM, KIMBERLY BEECHAM,
 17 S.Y.B., a minor by and through her co-guardians ad
 litem DUANE BEECHAM and KIMBERLY
 18 BEECHAM; OLIVER VERGARA, JENNIFER
 VERGARA, E.V., a minor by and through his co-
 19 guardians ad litem OLIVER VERGARA and
 20 JENNIFER VERGARA; and M.B., a minor by and
 through his guardian ad litem MANOJ
 21 THOTTASSERI,

22 Plaintiffs,

23 v.

24 ROSEVILLE CITY SCHOOL DISTRICT,
 25 THERESA VANWAGNER, GEORGE ROOKS,
 JERROLD JORGENSEN and DOES 1-30,

26 Defendants.
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Case No.: 2:15-CV-01022-KJM-EFB

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

Judge: Hon. Kimberly J. Mueller

Complaint Filed: May 12, 2015

Trial Date: November 27, 2017

1 Plaintiffs DUANE BEECHAM, KIMBERLY BEECHAM, S.Y.B., a minor by and
2 through her co-guardians ad litem DUANE BEECHAM and KIMBERLY BEECHAM;
3 OLIVER VERGARA, JENNIFER VERGARA, E.V., a minor by and through his co-guardians
4 ad litem OLIVER VERGARA and JENNIFER VERGARA; M.B., a minor by and through his
5 guardian ad litem MANOJ THOTTASSERI, by and through their counsel Peter W. Alfert, of
6 Law Offices of Peter Alfert, APC, and Todd Boley and Justin Young of Law Offices of Todd
7 Boley; Defendants ROSEVILLE CITY SCHOOL DISTRICT, GEORGE ROOKS, and
8 JERROLD JORGENSEN, by and through their counsel, Carol Wieckowski of Evans,
9 Wieckowski, Ward & Scoffield; and Defendant THERESA VAN WAGNER, by and through her
10 counsel, Natasha Langenfeld of Longyear, O’Dea & Lavra, LLP, hereby submit the following
11 stipulation to extend the deadline to complete expert discovery to June 15, 2017.

12 **RECITALS**

13 **WHEREAS**, on November 24, 2015, this Court’s Pretrial Scheduling Order (Doc. 27) set
14 **May 1, 2017**, as the date by which expert discovery must be completed; and

15 **WHEREAS**, the parties have worked diligently to attempt to schedule the deposition of
16 all experts’ consultants before the Court’s deadline, but have been unable to do so; and

17 **WHEREAS**, the deposition of Plaintiffs’ consultants Peter Formuzis and Joseph
18 Schwartberg are scheduled for May 3, 2017 and May 16, 2017 respectively and the deposition
19 of Defendants’ consultant Anlee Kuo is scheduled for May 22, 2017 and it is agreed among the
20 parties that the deposition of Miriam King will be set for a date on or before June 15, 2017.

21 **IT IS HEREBY STIUPLATED**, by and between Plaintiffs and Defendants, by and
22 through their respective counsel that:

23 1. The parties respectfully request that the Court continue the deadline by which the
24 parties are to complete expert discovery to June 15, 2017.

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1 Dated: April 25, 2017

LAW OFFICES OF PETER ALFERT, APC

2 /s/ Peter Alfert

3 PETER ALFERT
4 Attorneys for Plaintiffs

5 Dated: April 25, 2017

LAW OFFICES OF TODD BOLEY

6 /s/ Todd Boley

7 TODD BOLEY
8 Attorneys for Plaintiffs

9
10 Dated: April 25, 2017

LONGYEAR, O'DEA & LAVRA, LLP

11 /s/ Gregory O'Dea

12 GREGORY P. O'DEA
13 NATASHA LAGENFELD
14 Attorneys for Defendant
15 Theresa Van Wagner

16 Dated: April 25, 2017

**EVANS, WIECKOWSKI, WARD
& SCOFFIELD, LLP**

17 /s/ Carol Wieckowski

18 CAROL A. WIECKOWSKI
19 Attorneys for Defendants
20 Roseville City School District, George Rooks,
21 and Jerrold Jorgensen


ORDER

Having read and considered the parties' Stipulation to Extend The Expert Discovery Cutoff, IT IS HEREBY ORDERED THAT:

1. The date for the completion of expert discovery shall be continued to June 15, 2017.

IT IS HEREBY ORDERED.

DATED: May 3, 2017.


UNITED STATES DISTRICT JUDGE