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11 **UNITED STATES DISTRICT COURT**

12 **EASTERN DISTRICT OF CALIFORNIA SACRAMENTO DIVISION**

13 MARTIN GASCA, an individual) Case No.: 2:15-cv-01109-WBS-CKD
14 Plaintiff,)
15 vs.) **STIPULATION TO MODIFY**
16 COUNTY OF SACRAMENTO, a municipal) **SCHEDULING ORDER**
17 corporation; DOE OFFICER 1 and DOES 2-)
18 25,)
Defendants.)

19 The Plaintiff Martin Gasca, by and through his attorneys, and Defendants, County of
20 Sacramento and Deputy Nathan Burnette, by and through their attorneys, stipulate as follows:

21 The current Scheduling Order has established May 13, 2016 as the last day to disclose
22 experts and their reports pursuant to FRCP 26(a)(2). Rebuttal experts are to be disclosed by June
23 10, 2016.

24 The parties are actively engaged in discovery. They have exchanged written discovery
25 requests and responses, as well as produced documents. Defendant took the deposition of the
26 Plaintiff on March 15, 2016. The parties have not yet received the transcript. Plaintiff has
27 noticed the depositions of Defendant Burnette and two third party County witnesses for March
28 31, 2016. Defendant would also like to take the depositions of two third party witnesses on a

1 mutually agreeable date. Some travel may be required for one of these additional depositions
2 due to the witness's residence.

3 In light of the foregoing, the parties believe they will be unable to complete discovery on
4 the claims and defenses with sufficient remaining time for comprehensive review by an expert
5 before the current May 13, 2016 deadline. Thus, the Parties have stipulated to extend the time
6 for expert disclosures by forty-five (45) days.

7 The parties stipulate to modify the scheduling order as follows:

- 8 1. Expert Disclosure – June 27, 2016
- 9 2. Rebuttal Expert Disclosure- July 25, 2016

10 All other dates shall remain the same.

11 IT IS SO STIPULATED

12 Dated: March 29, 2016

LONGYEAR, O'DEA & LAVRA, LLP

13
14 By: /s/ Kelley S. Kern
15 JOHN A. LAVRA
16 KELLEY S. KERN
17 Attorneys for Defendant

18 Dated: March 29, 2016

LAW OFFICE OF BROWN & GESSELL

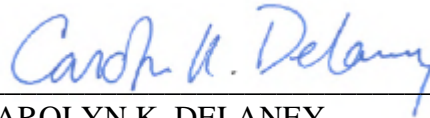
19 By: /s/ Douglas A. Gessell
20 DOUGLAS A. GESSELL
21 STEVEN L. BROWN
22 Attorneys for Plaintiff
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ORDER

Pursuant to stipulation, it is ordered that the parties exchange Expert Witness Reports by June 27, 2016 and Rebuttal Expert Witness Reports by July 25, 2016.

IT IS SO ORDERED:

Dated: March 31, 2016



CAROLYN K. DELANEY
UNITED STATES MAGISTRATE JUDGE

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