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6 Attorneys for Defendants
CITY OF MANTECA, ARMANDO GARCIA, RANCH
7 JOHNSON, KIRK DOTY, MIKE KEENER, IAN
OSBORN, ARMEN AVAKIAN, PAUL CARMONA and
8 CHRIS S. MRAZ

9
10 UNITED STATES DISTRICT COURT
11 EASTERN DISTRICT OF CALIFORNIA
12 SACRAMENTO COURTHOUSE

13 JOANNE BLIGHT,

14 Plaintiff,

15 v.

16 CITY OF MANTECA, a Municipal
Corporation, Manteca Police Department
17 Detectives ARMANDO GARCIA,
Individually, RANCH JOHNSON,
18 Individually, KIRK DOTY, Individually,
MIKE KEENER, Individually, IAN
19 OSBORN, Individually, and ARMEN
AVAKIAN, Individually, Manteca Police
20 Department Sergeants PAUL CARMONA
and CHRIS S. MRAZ, in their Individual
21 and Supervisory capacities, and DOES 1
THROUGH 60, Jointly and Severally,

22 Defendants.
23

Case No.: 2:15-cv-02513-WBS-CKD

**STIPULATION TO EXTEND EXPERT
DISCOVERY DEADLINE; ORDER**

1 **TO THE CLERK OF THE COURT, ALL PARTIES, AND THEIR ATTORNEYS**
2 **OF RECORD:**

3 In its Scheduling Order dated March 22, 2016 (Docket No. 8), the Court set various
4 deadlines, including: expert disclosure (September 13, 2016); rebuttal expert disclosure (October
5 4, 2016); and discovery cutoff (January 10, 2017).

6 Plaintiff JOANNE BLIGHT and Defendants CITY OF MANTECA, ARMANDO
7 GARCIA, RANCH JOHNSON, KIRK DOTY, MIKE KEENER, IAN OSBORN, ARMEN
8 AVAKIAN, PAUL CARMONA and CHRIS S. MRAZ (“Defendants”) have met-and-conferred
9 on these dates and -- despite due diligence by all sides -- believe additional time will be needed
10 for expert and rebuttal disclosures. Discovery is still being conducted that will bear upon expert
11 opinions and reports. Depositions of all Defendants were noticed at the outset of discovery, but
12 due to a pending discovery issue that will require resolution by the Court via a motion – as well as
13 the parties’ desire to accommodate the schedules of the police officer defendants to the extent
14 possible and other circumstances outside the control of the parties – these depositions had to be
15 postponed. The depositions that can proceed have been going forward, however. An additional
16 challenge has been reconciling the numerous schedules of attorneys on both sides of this case,
17 including their busy trial calendars. Nonetheless, the parties have diligently met-and-conferred to
18 move the discovery process forward and have been conducting the necessary depositions and
19 other discovery, with more on calendar. Based on the foregoing circumstances, the parties
20 respectfully stipulate to the following, and request the Court’s approval.

21 By and through the counsel of record for Defendants and Plaintiff, the parties stipulate as
22 follows:

- 23 1. The deadline for expert disclosure is extended to November 8, 2016;
- 24 2. The deadline for rebuttal expert disclosure is extended to November 29, 2016;
- 25 3. The deadline for all discovery remains unchanged; it closes on January 10, 2017.

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Respectfully submitted,

Dated: September 9, 2016

LAW OFFICES OF SANJAY S. SCHMIDT

By: /s/ Sanjay S. Schmidt
SANJAY S. SCHMIDT
Attorneys for Plaintiff
JOANNE BLIGHT

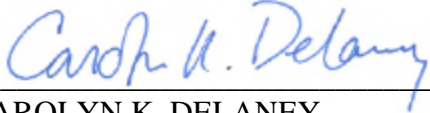
Dated: September 9, 2016

ALLEN, GLAESSNER,
HAZELWOOD & WERTH, LLP

By: /s/ Kevin P. Allen
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CITY OF MANTECA, ARMANDO
GARCIA, RANCH JOHNSON, KIRK DOTY,
MIKE KEENER, IAN OSBORN, ARMEN
AVAKIAN, PAUL CARMONA and CHRIS
S. MRAZ

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: September 13, 2016


Carolyn K. Delaney
CAROLYN K. DELANEY
UNITED STATES MAGISTRATE JUDGE