1 2 3 4 5 6 7 8 9	DALE L. ALLEN, JR., State Bar No. 145279 dallen@aghwlaw.com KEVIN P. ALLEN, State Bar No. 252290 kallen@aghwlaw.com ALLEN, GLAESSNER, HAZELWOOD & WERTH, LLP 180 Montgomery Street, Suite 1200 San Francisco, CA 94104 Telephone: (415) 697-2000 Facsimile: (415) 813-2045 Attorneys for Defendants CITY OF MANTECA, ARMANDO GARCIA, RANCH JOHNSON, KIRK DOTY, MIKE KEENER, IAN OSBORN, ARMEN AVAKIAN, PAUL CARMONA and CHRIS S. MRAZ		
9 10	UNITED STATES DISTRICT COURT		
10	EASTERN DISTRICT OF CALIFORNIA		
12	SACRAMENTO COURTHOUSE		
13	JOANNE BLIGHT,	Case No.: 2:15-cv-02513-WBS-CKD	
14	Plaintiff,	STIPULATION TO EXTEND EXPERT DISCOVERY DEADLINE; [PROPOSED]	
15	v.	ORDER	
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 and Supervisory capacities, and DOES 1		
21 22	THROUGH 60, Jointly and Severally,		
22	Defendants.		
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28			
		1 STIPULATION; PROPOSED ORDER 2:15-CV-02513-WBS-CKD	

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

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

On September 9, 2016, the parties submitted a stipulated request to extend expert disclosure to November 8, 2016 and rebuttal disclosure to November 29, 2016. (Docket No. 11). The basis for the stipulation was outstanding depositions. (*Id.*) The Court granted the request. (Docket No. 12).

On October 14, 2016, the parties filed their Joint Statement on Discovery Dispute (re: confidential informant). (Docket No. 20). The hearing occurred on November 2nd; the Court issued an order on November 7th. As the parties evaluate the order and determine the next steps in the case, they respectfully request additional time for expert and rebuttal disclosures.¹

Based on the foregoing circumstances, the parties respectfully stipulate to the following, and request the Court's approval.

By and through the counsel of record for Defendants and Plaintiff, the parties stipulate and request the following:

1. That the deadline for expert disclosure be extended to November 22, 2016;

2. That the deadline for rebuttal expert disclosure be extended to December 13, 2016;

3. That, for the time being, the deadline for all discovery remain January 10, 2017.

 $\frac{27}{1}$ The parties may also request an extension of the discovery deadline. If so, they will file such request in the coming weeks.

1 2	Respectfully submitted,	
3	Dated: November 8, 2016	LAW OFFICES OF SANJAY S. SCHMIDT
4 5		
6		By: <u>/s/ Sanjay S. Schmidt</u> SANJAY S. SCHMIDT
0 7		Attorneys for Plaintiff JOANNE BLIGHT
8		
9	Dated: November 8, 2016	ALLEN, GLAESSNER,
10		HAZELWOOD & WERTH, LLP
11		By: /s/ Kevin P. Allen
12		By: <u>/s/ Kevin P. Allen</u> DALE L. ALLEN, JR. KEVIN P. ALLEN
13		Attorneys for Defendants CITY OF MANTECA, ARMANDO
14		GARCIA, RANCH JOHNSON, KIRK DOTY, MIKE KEENER, IAN OSBORN, ARMEN
15		AVAKIAN, PAUL CARMONA and CHRIS S. MRAZ
16		
17	PURSUANT TO STIPULATION, IT IS SO ORDERED.	
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19	DATED: November 8, 2016	
20		alless Clane
21		ALLISON CLAIRE UNITED STATES MAGISTRATE JUDGE
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		3 STIPULATION; PROPOSED ORDER 2:15-CV-02513-WBS-CKD