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12 Attorney for Plaintiff Angela Ainley

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 14 **UNITED STATES DISTRICT COURT**
 15 **EASTERN DISTRICT OF CALIFORNIA**

17 ANGELA AINLEY, individually and as)
 successor-in-interest for KRIS JACKSON ,)
 18 Deceased; PATRICK JACKSON, individually)
 and as successor-in-interest for KRIS)
 19 JACKSON, Deceased;)
 Plaintiffs,)
 20 vs.)

No: 2:16-cv-00049-TLN-CKD

21 CITY OF SOUTH LAKE TAHOE, a public)
 22 entity; JOSHUA KLINGE, individually and as a)
 police officer for the City of South Lake Tahoe;)
 23 ELI CLARK, individually and as a police)
 officer for the City of South Lake Tahoe; City)
 24 of South Lake Tahoe Chief of Police BRIAN)
 25 UHLER, individually; and DOES 2 THROUGH)
 10, Jointly and Severally,)

**STIPULATION AND ORDER TO
 MODIFY CASE MANAGEMENT
 DATES**

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 27 Defendants

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1 The parties respectfully request that the Court modify the case management and trial dates
2 as follows:

| <u>Case Event</u> | <u>Current Date</u> | <u>Proposed Date</u> |
|-------------------------|---------------------|----------------------|
| 1. Non-expert discovery | April 30, 2018 | June 29, 2018 |
| 2. Expert reports | June 28, 2018 | August 3, 2018 |

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6 **Good Cause to Continue Pretrial Dates:**

7 Plaintiffs have deposed the two defendant officers in this matter with Officer Klinge now
8 residing in Oregon. Plaintiffs must still depose the following people: Defendant Chief of Police
9 Brian Uhler, South Lake Tahoe Police Department (SLTPD) Homicide Investigator J. Roberson,
10 SLTPD Sgt. Cheney, El Dorado Sheriff Office Deputy Aguilar, and Tiana Perez, the witness to
11 Kris Jackson's shooting. Defendants still need to depose the two Plaintiffs in addition to at least
12 two additional eyewitnesses (both of whom were transient at the time and have not been readily
13 available). Due to all counsel's conflicting court dates and depositions in other cases, as well as
14 previously scheduled vacations for counsel, the parties must depose the above-mentioned
15 deponents after the current close of fact discovery. The parties have agreed on dates by which to
16 depose all the remaining deponents. All other case management dates would remain the same.

17 The following represents each party's counsel's case and vacation schedule from May 2017
18 to the present:

19 **Counsel for Defendants' trial schedule May 2017 through 2018:**

| | | |
|-------------------------------------|----------------|--------------------------------|
| Peralez v. City of Fresno | May 2017 | Dismissed just prior to trial |
| Hernandez v. City of Salinas | July 2017 | Settled shortly before trial |
| Gonzalez v. City of Lindsay | July 2017 | Dismissed shortly before trial |
| Knox v. City of Fresno | Jan - Oct 2017 | Trial & Appeal |
| Ma v. City of Fresno | Oct 2017 | Dismissed day prior to trial |
| Rodriguez v. City of Fresno | Nov 2017 | Trial |
| Garcia v. City of Fresno | Sept 18, 2018 | |
| Garcia v. City of Santa Maria | Nov 5, 2018 | |
| Gonzalez v. City of Fresno | Dec 4, 2018 | |
| Casillas v. City of Fresno | Feb 26, 2019 | |
| Jackson v. City of South Lake Tahoe | Mar 2019 | |

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27 **Counsel for Plaintiff Ainley's trial schedule May 2017 to present:**

1 See Attachment A.

2 Counsel for Plaintiff Jackson’s trial, deposition, and vacation schedule May 2017 to present:

| | | | |
|----|------------------------------|-----------------|-----------------------------------|
| 3 | May v. San Mateo County | June, 2017 | Trial |
| 4 | Perkins v. Oakland | Sept, 2017 | Deps of Plaintiffs and Defendants |
| 5 | Neuroth v. Mendocino County | Oct, 2017 | Deps of witnesses |
| 6 | Bascos v. Santa Clara County | Nov-Dec, 2017 | Deps of Defendants |
| 7 | Slusher v. Napa | Jan-Feb, 2018 | Deps of Defendants |
| 8 | Neuroth v. Mendocino County | March, 2018 | Deps of Expert witnesses |
| 9 | Martinez v. Pittsburg | April-May, 2018 | Deps of Defendants and witnesses |
| 10 | Slusher v. Napa | October, 2018 | Trial |

11 Counsel for Plaintiff Jackson has also had to respond to a number of motions to dismiss and
12 motions for summary judgment, in the above cases and in other cases. In addition to the workload
13 in other cases, Ms. Sherwin and Mr. Haddad have scheduled vacation April 7-13, 2018 and May
14 19-31, 2018 after having to cancel previous vacations.

15 For the forgoing reasons, the parties respectfully request that the Court modify the case
16 management order as requested herein.

17 Dated: April 11, 2018

HADDAD & SHERWIN LLP

By: /s/ Maya Sorensen

MAYA SORENSEN
Attorneys for Plaintiff Jackson

18 DATED: April 11, 2018

LAW OFFICES OF DALE K. GALIPO

/s/ Dale Galipo

Dale K. Galipo
Attorneys for Plaintiff Angela Ainley

19 DATED: April 11, 2018

FERGUSON PRAET & SHERMAN

/s/ Bruce Praet

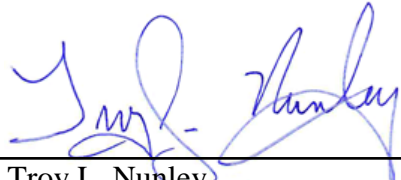
Bruce Praet
Attorneys for Defendants City of South Lake
Tahoe and Joshua Klinge

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MODIFIED CASE MANAGEMENT ORDER

Pursuant to the Court's Minute Order and stipulation of the parties, and for good cause, IT
IS SO ORDERED.

Dated: April 16, 2018



Troy L. Nunley
United States District Judge