	CYRUS ZAL, SBN: 102415	
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4	Attorney for Plaintiffs GUILLERMO BONILLA and SANDRA AMAYA BONILLA	
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7	IN THE UNITED STATES DISTRICT COURT	
8	FOR THE EASTERN DISTRICT OF CALIFORNIA	
9	FOR THE EASTERN DISTRICT OF CALIFORNIA	
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11	GUILLERMO BONILLA, SANDRA AMAYA BONILLA,	CASE NO. 2:16-cv-01742-LEK
12	Plaintiff,	
13	Trainerr,	
14	V.	STIPULATION OF THE PARTIES
15		REQUESTING MODIFICATION OF THE SCHEDULING ORDER;
16		DECLARATION OF CYRUS ZAL IN SUPPORT THEREOF; REQUEST OF
17	CALIFORNIA HIGHWAY PATROL	THE PARTIES FOR A TELEPHONIC CONFERENCE WITH THE COURT RE
18	AN AGENCY OF THE STATE OF CALIFORNIA; OFFICER MCKENZIE	THEIR REQUEST FOR
19	AND SGT. PETERSON and DOES 1 TO 50,	MODIFICATION OF THE SCHEDULING ORDER; AND
20	Defendants.	PROPOSED ORDER THEREON
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Plaintiffs GUILLERMO BONILLA and SANDRA AMAYA BONILLA, through their undersigned counsel, and Defendants CALIFORNIA HIGHWAY PATROL and OFFICER McKENZIE, through their undersigned counsel, respectfully submit the following Stipulation for consideration by the Court: The Parties request and stipulate that the current Scheduling Order be modified. The Parties further request and stipulate that said modification to the current Scheduling Order be discussed in a telephonic conference with the Court and the Parties. The requested modification includes establishing a new discovery deadline, new motion deadlines, a new trial date and the modification of any other dates as The basis and the reasons for the Parties' request to modify the current Scheduling Order are set forth in the Declaration of Cyrus Zal, counsel for Plaintiffs, Cyrus Zal, A Professional Corporation /s/ Cyrus Zal Cyrus Zal, Attorney for Plaintiffs Guillermo Bonilla and Sandra Amaya Bonilla

XAVIER BECERRA Attorney General of California ALBERTO L. GONZALEZ Supervising Deputy Attorney General

By: <u>/s/ Catherine Woodbridge</u>

CATHERINE WOODBRIDGE Deputy Attorney General Attorneys for Defendant California Highway Patrol

DECLARATION OF CYRUS ZAL IN SUPPORT OF STIPULATATION

- I, Cyrus Zal, declare as follows:
- 1. I am the attorney of record for Plaintiffs GUILLERMO BONILLA and SANDRA AMAYA BONILLA in the above-referenced action.
 - 2. I make this declaration in support of the Stipulation set forth above.
- 3. On June 27, 2018 I was diagnosed with needing full hip replacement surgery on both of my hips, as both of my hip joints had completely stopped functioning, causing me great pain and lack of mobility. This was a condition that had been developing for quite some time, but X-rays were not taken until June 25, 2018 and the diagnosis was made two days later on June 27, 2018.
- 4. On July 9, 2018 the first hip replacement surgery was scheduled to take place on August 13, 2018. My recovery time is expected to be 8 to 10 weeks from this first surgery. After I recover from my first surgery, I need to undergo hip replacement surgery on my other hip.
- 5. At the present time, I am unable to participate in any depositions due to my physical condition, as my mobility and ability to travel even short distances is extremely limited by the great pain and discomfort I am experiencing. Plaintiffs'

1 depositions had been scheduled for July 18, 2018, but they were taken off calendar due 2 to my inability to participate in the depositions. 3 6. I anticipate being able to work again after my second hip replacement surgery, which I hope to schedule in October or November of this year. The second 4 5 surgery will also require 8 to 10 weeks of recovery time. I estimate I will be able to 6 return to work in February of 2019. 7 7. Due to the foregoing circumstances, the Parties are requesting a 8 modification of the current Scheduling Order and are further requesting that the Court 9 hold a telephonic conference call with both counsel to discuss modification of the 10 current Scheduling Order. 11 8. If called as a witness, I could and would competently testify to the 12 foregoing, as the facts stated therein are within my personal knowledge. 13 I declare under penalty of perjury under the laws of the United States that the 14 foregoing is true and correct. Executed this 10th day of July, 2018 at Folsom California. 15 16 17 /s/ Cvrus Zal 18 Cyrus Zal 19 20 21 22 23 24 25

ORDER

Based on the foregoing Stipulation and Declaration of Cyrus Zal, the Court hereby orders that a telephonic conference be held with counsel for the Parties to discuss modification of the current Scheduling Order.

The Court Assistant shall arrange the conference call.

IT IS SO ORDERED.

Dated: July $10, 2^{\Omega_{1Q}}$



/s/ Leslie E. Kobayashi
Leslie E. Kobayashi
United States District Judge