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CYRUS ZAL, SBN: 102415
CYRUS ZAL, A PROFESSIONAL CORPORATION
102 Mainsail Court
Folsom, CA 95630
(916) 985-3576
(916) 985-4893 (FAX)

Attorney for Plaintiffs GUILLERMO BONILLA and
SANDRA AMAYA BONILLA

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

GUILLERMO BONILLA, SANDRA
AMAYA BONILLA,

Plaintiff,

v.

CALIFORNIA HIGHWAY PATROL
AN AGENCY OF THE STATE OF
CALIFORNIA; OFFICER MCKENZIE
AND SGT. PETERSON and DOES 1
TO 50,

Defendants.

CASE NO. 2:16-cv-01742-LEK

**STIPULATION OF THE PARTIES
REQUESTING MODIFICATION OF
THE SCHEDULING ORDER;
DECLARATION OF CYRUS ZAL IN
SUPPORT THEREOF; REQUEST OF
THE PARTIES FOR A TELEPHONIC
CONFERENCE WITH THE COURT RE
THEIR REQUEST FOR
MODIFICATION OF THE
SCHEDULING ORDER; AND
PROPOSED ORDER THEREON**

1 Dated: July 10, 2018

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

2
3 By: /s/ Catherine Woodbridge

4 CATHERINE WOODBRIDGE
5 Deputy Attorney General
6 *Attorneys for Defendant California
Highway Patrol*

7
8 **DECLARATION OF CYRUS ZAL IN SUPPORT OF STIPULATION**

9
10 I, Cyrus Zal, declare as follows:

11 1. I am the attorney of record for Plaintiffs GUILLERMO BONILLA and
12 SANDRA AMAYA BONILLA in the above-referenced action.

13 2. I make this declaration in support of the Stipulation set forth above.

14 3. On June 27, 2018 I was diagnosed with needing full hip replacement
15 surgery on both of my hips, as both of my hip joints had completely stopped
16 functioning, causing me great pain and lack of mobility. This was a condition that had
17 been developing for quite some time, but X-rays were not taken until June 25, 2018 and
18 the diagnosis was made two days later on June 27, 2018.

19 4. On July 9, 2018 the first hip replacement surgery was scheduled to take
20 place on August 13, 2018. My recovery time is expected to be 8 to 10 weeks from this
21 first surgery. After I recover from my first surgery, I need to undergo hip replacement
22 surgery on my other hip.

23 5. At the present time, I am unable to participate in any depositions due to
24 my physical condition, as my mobility and ability to travel even short distances is
25 extremely limited by the great pain and discomfort I am experiencing. Plaintiffs'

ORDER

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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, 2018



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