| 1<br>2<br>3<br>4<br>5 | McGREGOR W. SCOTT<br>United States Attorney<br>RACHEL R. DAVIDSON<br>Assistant United States Attorney<br>501 I Street, Suite 10-100<br>Sacramento, CA 95814<br>Telephone: (916) 554-2700<br>Facsimile: (916) 554-2900<br>Rachel.Davidson@usdoj.gov |                |   |                    |  |
|-----------------------|--|----------------|---|--------------------|--|
| 6                     | Attorneys for the United States  |                |   |                    |  |
| 7                     | IN THE UNITED STATES DISTRICT COURT  |                |   |                    |  |
| 8                     | EASTERN DISTRICT OF CALIFORNIA   |                |   |                    |  |
| 9                     |  |                |   |                    |  |
| 10                    | GIANFRANCO RUFFINO,  |                | CASE NO. 2:16-CV-02719-KJM-CKD                |                    |  |
| 11                    | Plaintiff,   |                | STIPULATION AND ORDER TO EXTEND CASE SCHEDULE |                    |  |
| 12                    | v.   |                |   |                    |  |
| 13                    | UNITED STATES,   |                |   |                    |  |
| 14                    | Defen  | dant.          |   |                    |  |
| 15                    |  |                |   |                    |  |
| 16                    | The United States has requested and Plaintiff has agreed to stipulate to a request that the Court  |                |   |                    |  |
| 17                    | amend the current case schedule to extend the remaining expert disclosure deadlines and the deadline for   |                |   |                    |  |
| 18                    | hearing of dispositive motions. Counsel for the United States requests this extension on the basis that  |                |   |                    |  |
| 19                    | counsel is attending a mandatory, two week, training program in South Carolina, and thus needs more  |                |   |                    |  |
| 20                    | time to meet Defendant's expert disclosure deadline, currently set for March 27, 2020. Accordingly, the  |                |   |                    |  |
| 21                    | parties' request that the Court amer   | ad the current | case schedule as follo                        | DWS:               |  |
| 22                    | Event  | Current Sch    | redule  | Requested Schedule |  |
| 23                    | Deadline to disclose experts on  | March 27, 20   | 020   | April 27, 2020     |  |
| 24                    | issues which a party does not bear the burden of proof:  |                |   |                    |  |
| 25                    | Expert rebuttal reports  | April 24, 202  | 20  | June 12, 2020      |  |
| 26                    | Expert discovery cutoff  | May 22, 202    | 0   | July 10, 2020      |  |
| 27<br>28              | Deadline for hearing on dispositive motions  | July 24, 2020  | 0   | August 28, 2020    |  |

STIPULATION TO EXTEND CASE SCHEDLE

1

| 1  |   | Respectfully submitted,   |  |  |  |
|--|---|---|--|--|--|
| 2  | Dated: February 27, 2020  | McGREGOR W. SCOTT<br>United States Attorney                           |  |  |  |
| 3  |   | United States Attorney  |  |  |  |
| 4  | By:   | /s/ Rachel R. Davidson<br>RACHEL R. DAVIDSON                          |  |  |  |
| 5  |   | Assistant United States Attorney                                      |  |  |  |
| 6  |   |   |  |  |  |
| 7  | Dated: February 27, 2020  | Frederick Schenk<br>Jillian F. Hayes                                  |  |  |  |
| 8  |   | CASEY GERRY SCHENK FRANCAVILLA<br>BLATT & PENFIELD, LLP               |  |  |  |
| 9  |   |   |  |  |  |
| 10   | By:   | /s/ Frederick SchenkI (auth. 2/27/2020)<br>Attorneys for Plaintiff    |  |  |  |
| 11   |   |   |  |  |  |
| 12   |   |   |  |  |  |
| 13   | ORDER:  |   |  |  |  |
| 14   | For good cause appearing, the Court sets the  | e following deadlines:  |  |  |  |
|  |   |   |  |  |  |
| 15   | Event   | Schedule  |  |  |  |
| 15<br>16   | Deadline to disclose experts on issues which a  | Schedule<br>April 27, 2020  |  |  |  |
|  |   |   |  |  |  |
| 16   | Deadline to disclose experts on issues which a party does not bear the burden of proof  | April 27, 2020  |  |  |  |
| 16<br>17   | Deadline to disclose experts on issues which a<br>party does not bear the burden of proof<br>Expert rebuttal reports<br>Expert discovery cutoff<br>Deadline for hearing on  | April 27, 2020<br>June 12, 2020                                       |  |  |  |
| 16<br>17<br>18   | Deadline to disclose experts on issues which a<br>party does not bear the burden of proof<br>Expert rebuttal reports<br>Expert discovery cutoff   | April 27, 2020<br>June 12, 2020<br>July 10, 2020                      |  |  |  |
| 16<br>17<br>18<br>19   | Deadline to disclose experts on issues which a<br>party does not bear the burden of proof<br>Expert rebuttal reports<br>Expert discovery cutoff<br>Deadline for hearing on  | April 27, 2020<br>June 12, 2020<br>July 10, 2020                      |  |  |  |
| <ol> <li>16</li> <li>17</li> <li>18</li> <li>19</li> <li>20</li> </ol>   | Deadline to disclose experts on issues which a party does not bear the burden of proof         Expert rebuttal reports         Expert discovery cutoff         Deadline for hearing on dispositive motions                                      | April 27, 2020<br>June 12, 2020<br>July 10, 2020                      |  |  |  |
| <ol> <li>16</li> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> </ol>   | Deadline to disclose experts on issues which a<br>party does not bear the burden of proof<br>Expert rebuttal reports<br>Expert discovery cutoff<br>Deadline for hearing on<br>dispositive motions<br>IT IS SO ORDERED.                          | April 27, 2020<br>June 12, 2020<br>July 10, 2020                      |  |  |  |
| <ol> <li>16</li> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> </ol>                                     | Deadline to disclose experts on issues which a<br>party does not bear the burden of proof<br>Expert rebuttal reports<br>Expert discovery cutoff<br>Deadline for hearing on<br>dispositive motions<br>IT IS SO ORDERED.                          | April 27, 2020<br>June 12, 2020<br>July 10, 2020<br>September 4, 2020 |  |  |  |
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