1 2	BARTH DALY LLP	
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5	Attorneys for Plaintiffs	
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8	IN THE UNITED STATES DISTRICT COURT	
9	FOR THE EASTERN DISTRICT OF CALIFORNIA	
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11 12	JANETTE RAMIREZ, individually and as a representative of the Estate of ROBERTO BALDIZON, Deceased; ANA JUSCAMAITA, individually and as a representative of the Estate of ROBERTO BALDIZON, Deceased; and THE ESTATE OF ROBERTO BALDIZON,	Case No. 2:17-CV-00228-WBS-AC
13		STIPULATION AND [PROPOSED] ORDER
14		
15	Plaintiffs,	
16	v.	
17	JEFFREY MACOMBER, individually and in	
18	his official capacity as Former Warden of California State Prison-Sacramento and	
19	DOES 1 through 100, inclusive, in their official and personal/individual capacities,	
20	Defendants.	
21		
22	Plaintiffs Janette Baldizon and Ana Juscamaita, and Defendant Macomber, through their	
23	counsel, stipulate as follows:	
24	1. This court previously ordered an amended complaint be filed no later than April 13,	
25	2018;	
26	2. In the interim plaintiffs' counsel obtained and reviewed certain records in anticipation	
27	of filing an amended complaint;	
28	3. Plaintiffs' counsel requires additional time to confer with her clients regarding the	
	{00024549}	

information contained in those records. As such Plaintiffs are requesting four additional weeks prior to filing an amended complaint or other pleading;

- 4. The parties wish to make the following changes to the previous scheduling order:
 - a. Initial Expert Witness Disclosures Due November 30, 2018;
 - b. Rebuttal Expert Witness Disclosures Due January 30, 2019;
 - c. Discovery Cut-Off March 30, 2019; and
 - d. All other dates not specifically addressed herein remain the same.
- A further amended complaint or other pleading shall be filed by Plaintiff no later than May 11, 2018.
- 6. Defendants do not object.

Dated: April 12, 2018. Respectfully submitted,

BARTH DALY LLP

By /s/ Kresta Nora Daly
KRESTA NORA DALY
Attorneys for Plaintiffs

Dated: April 12, 2018. Respectfully submitted,

XAVIER BECERRA ATTORNEY GENERAL OF CALIFORNIA

By /s/ R. Lawrence Bragg
R. LAWRENCE BRAGG
Supervising Deputy Attorney General
Attorneys for Defendant Macomber

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ORDER

In light of the stipulation of the parties, and good cause appearing, it is ordered that Plaintiff may file a further Amended Complaint or other pleading no later than May 11, 2018, that Initial Expert Witness Disclosures are due by November 30, 2018, that Rebuttal Expert Witness Disclosures are due by January 30, 2019, that the discovery cut-cut off is extended to April 1, 2019; and all other dates not specifically addressed herein remain the same.

Dated: April 13, 2018

WILLIAM B. SHUBB

UNITED STATES DISTRICT JUDGE