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7 IN THE UNITED STATES DISTRICT COURT
8 EASTERN DISTRICT OF CALIFORNIA

9 KATIE FEENEY,

10 Plaintiff,

11 v.

12 UNITED STATES OF AMERICA,

13 Defendant.
14

CASE NO. 2:17-cv-02303 JAM-AC

**JOINT STIPULATION AND ORDER TO
MODIFY THE STATUS (PRE-TRIAL
SCHEDULING) ORDER [ECF No. 8]**

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16 Plaintiff Katie Feeney and Defendant United States respectfully propose and stipulate to modify
17 the Status (Pre-trial Scheduling) Order as set forth below. Status (Pre-trial Scheduling) Order [ECF No.
18 8]. There is good cause to modify the schedule due to Plaintiff's complex medical condition, which
19 includes disarticulation (i.e., amputation). In order to proceed with and complete both fact and expert
20 discovery, the parties agree that Plaintiff must undergo various medical exams. Due to Plaintiff's
21 complex medical condition, which includes the coordination of medical care with different physicians at
22 different medical institutions across the country, additional medical treatment and surgeries are being
23 undertaken. Plaintiff's additional medical treatment and surgeries have been postponed and will not
24 begin until mid to late August. As a result, the parties respectfully request a modification of the
25 scheduling order to allow Plaintiff the time needed to undergo additional medical treatment and
26 surgeries, and to allow the parties to complete fact and expert discovery.

27 The parties have been working together cooperatively and will continue to update the Court with
28 the case status. The parties are working towards an efficient resolution of this matter as required and

1 promoted in the Federal Rules of Civil Procedure. *See* Fed. R. Civ. P. 1.

<u>Schedule</u>	<u>Current</u>	<u>Proposed</u>
- Plaintiff's Expert Disclosures	June 14, 2019	Jan. 6, 2020
- Defendant's Expert Disclosures	July 12, 2019	Feb. 3, 2020
- Supplemental Expert Disclosures	Aug. 9, 2019	Feb. 21, 2020
- Discovery Cutoff	Aug. 9, 2019	March 20, 2020
- Dispositive Motion Filing Deadline	Sep. 10, 2019	April 10, 2020
- Last Day for Dispositive Motions to be Heard	Oct. 8, 2019	May 12, 2020
- Final Pretrial Conference	Dec. 13, 2019	July 14, 2020
- Trial (Bench, 8 days)	Feb. 3, 2020	Sep. 14, 2020

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12 Respectfully submitted,

13 Dated: July 26, 2019

McGREGOR W. SCOTT
United States Attorney

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15 By: /s/ Chi Soo Kim
Chi Soo Kim
Assistant United States Attorney
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17 Attorneys for the United States

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19 Dated: July 26, 2019

BOSTWICK & PETERSON, LLP

/s/ James S. Bostwick (auth'd 7/26/19)
James S. Bostwick, Esq.

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21 Attorneys for Plaintiff Katie Feeney
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1 **ORDER**

2
3 Schedule

Ordered

- 4 - Plaintiff's Expert Disclosures Jan. 6, 2020
5 - Defendant's Expert Disclosures Feb. 3, 2020
6 - Supplemental Expert Disclosures Feb. 21, 2020
7 - Discovery Cutoff March 20, 2020
8 - Dispositive Motion Filing Deadline April 21, 2020
9 - Last Day for Dispositive Motions to be Heard May 19, 2020
10 - Final Pretrial Conference July 17, 2020 at 10:00 AM
11 - Trial (Bench, 8 days) Sep. 14, 2020 at 9:00 AM

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13 IT IS SO ORDERED.

14 Dated: July 26, 2019

/s/ John A. Mendez

HONORABLE JOHN A. MENDEZ
United States District Court Judge