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6
7 IN THE UNITED STATES DISTRICT COURT
8 EASTERN DISTRICT OF CALIFORNIA
9

10 KATIE FEENEY,

11 Plaintiff,

12 v.

13 UNITED STATES OF AMERICA,

14 Defendant.

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

**JOINT STIPULATION AND ORDER TO
MODIFY THE SCHEDULING ORDER** [ECF
No. 11]

15
16 Plaintiff Katie Feeney and Defendant United States respectfully propose and stipulate to modify
17 the current scheduling order as set forth below. Joint Stip. and Order to Modify the Status (Pre-trial
18 Scheduling) Order [ECF No. 11]. There is good cause to modify the schedule due to Plaintiff's complex
19 medical condition, which includes disarticulation (i.e., amputation). In order to proceed with and
20 complete both fact and expert discovery, the parties agree that Plaintiff must undergo various medical
21 exams. Due to Plaintiff's complex medical condition, which includes the coordination of medical care
22 with different physicians at different medical institutions across the country, additional medical
23 treatment and surgeries were undertaken. Plaintiff began her medical exams in the fall but was not able
24 to complete them due to her various medical complications, and the parties are currently re-scheduling
25 them. As a result, the parties respectfully request a modification of the scheduling order to allow the
26 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	Jan. 6, 2020	April 24, 2020
- Defendant's Expert Disclosures	Feb. 3, 2020	June 5, 2020
- Supplemental Expert Disclosures	Feb. 21, 2020	June 25, 2020
- Discovery Cutoff	March 20, 2020	July 24, 2020
- Dispositive Motion Filing Deadline	April 10, 2020	Aug. 18, 2020
- Last Day for Dispositive Motions to be Heard	May 12, 2020	Sep. 15, 2020
- Final Pretrial Conference	July 14, 2020	Oct. 16, 2020 at 11:00
a.m.		
- Trial (Bench, 8 days)	Sep. 14, 2020	Nov. 16, 2020 at 9:00
a.m.		

14 Dated: February 6, 2020

Respectfully submitted,
McGREGOR W. SCOTT
United States Attorney

16 By: /s/ Chi Soo Kim
Chi Soo Kim
Assistant United States Attorney

Attorneys for the United States

BOSTWICK & PETERSON, LLP

20 Dated: February 6, 2020

/s/ James S. Bostwick (auth'd 2/6/20)
James S. Bostwick, Esq.

Attorneys for Plaintiff Katie Feeney

ORDER

IT IS SO ORDERED.

26 DATED: 2/7/2020

/s/ John A. Mendez
JOHN A. MENDEZ
United States District Court Judge