1 PORTER | SCOTT A PROFESSIONAL CORPORATION 2 Carl L. Fessenden, SBN 161494 William E. Camy, SBN 291397 3 350 University Ave., Suite 200 Sacramento, California 95825 4 TEL: 916.929.1481 FAX: 916.927.3706 5 Attorneys for Defendants 6 COUNTY OF SACRAMENTO, JAMES SCHAEFERS AND JOSEPH CAMPOY 7 LAW OFFICE OF STEWART KATZ STEWART KATZ, State Bar #127425 8 555 University Avenue, Suite 270 Sacramento, California 95825 9 TEL: 916.444.5678 Attorney for Plaintiffs 10 UNITED STATES DISTRICT COURT 11 EASTERN DISTRICT OF CALIFORNIA 12 13 ROBERT AUGUSTINE, individually and as CASE NO. 2:17-CV-02605-WBS-AC 14 successor in interest to LOGAN AUGUSTINE, Deceased: TIFFANY STIPULATION TO CONTINUE THE 15 AUGUSTINE, individually and as successor EXPERT DISCLOSURE AND in interest to LOGAN AUGUSTINE. **DISCOVERY DEADLINES:** 16 Deceased. [PROPOSED] ORDER 17 Plaintiff, Complaint Filed: 12/12/2017 18 V. 19 20 COUNTY OF SACRAMENTO; JAMES SCHAEFERS; JOSEPH CAMPOY; and 21 DOES 1 - 5, inclusive, 22 Defendants. 23 24 This Stipulation is entered into by and between Plaintiffs ROBERT AUGUSTINE, 25 individually and as successor in interest to LOGAN AUGUSTINE, Deceased; TIFFANY 26 AUGUSTINE, individually and as successor in interest to LOGAN AUGUSTINE, Deceased, 27 ("Plaintiffs") and Defendants COUNTY OF SACRAMENTO; JAMES SCHAEFERS; JOSEPH 28 CAMPOY ("Defendants") through their counsel of record. {01987859.DOCX} STIPULATION TO CONTINUE THE EXPERT DISCLOSURE AND DISCOVERY DEADLINES;

[PROPOSED] ORDER

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Sacramento, CA 95825

The Court previously set the deadline to disclose experts to be May 6, 2019, the deadline to disclose supplemental/rebuttal experts to be June 6, 2019, and the deadline to complete discovery to be July 12, 2019. <u>Dckt. No. 11.</u>

Given the issues presented by this case, the parties are still in the process of completing discovery that needs to be completed prior to the disclosure of expert witnesses and expert witnesses' reports. The parties have conferred and agree to continue the expert disclosure deadline to June 7, 2019, the supplemental/rebuttal expert disclosure deadline to June 28, 2019, and the discovery deadline to August 9, 2019. The parties submit good cause exists to extend the aforementioned deadlines. The parties further submit that continuing the aforementioned deadlines will not impact the Court's schedule. Specifically, continuing these deadlines will not disturb the last day to file dispositive motions and/or the trial date.

IT IS SO STIPULATED.

Dated: March 28, 2019 PORTER SCOTT
A PROFESSIONAL CORPORATION

By /<u>s/ William E. Camy</u>
William E. Camy
Attorneys for Defendants

Dated: March 28, 2019 LAW OFFICE OF STEWART KATZ

By /s/ Stewart Katz - as authorized on 3/25/2019
Stewart Katz
Attorney for Plaintiffs

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[PROPOSED] ORDER

Based upon the Stipulation of the parties:

- 1. The deadlines previously set for the disclosure of expert witnesses, supplemental/rebuttal expert witnesses, and to complete discovery are vacated.
- 2. The new deadline to disclose expert witnesses is June 7, 2019.
- 3. The new deadline to disclose supplemental/rebuttal expert witnesses is June 28, 2019.
- 4. The new deadline to complete discovery is August 9, 2019.

IT IS SO ORDERED.

DATED: March 28, 2019

ALLISON CLAIRE
UNITED STATES MAGISTRATE JUDGE