

1 **WILKE, FLEURY, HOFFELT, GOULD**
& BIRNEY, LLP
2 NEAL C. LUTTERMAN (SBN 174681)
nlutterman@wilkefleury.com
3 BIANCA S. SAMUEL (SBN 278231)
bsamuel@wilkefleury.com
4 400 Capitol Mall, Twenty-Second Floor
Sacramento, California 95814
5 Telephone: (916) 441-2430
Facsimile: (916) 442-6664
6 Attorneys for Defendants
THE REGENTS OF THE UNIVERSITY OF
7 CALIFORNIA; GREGORY SOKOLOV, M.D.;
DANIELLE DASS, LCSW; CHARLENE
8 WILLIAMS. N.P.: and ANDREA JAVIST

9 **LONGYEAR, O'DEA & LAVRA, LLP**
VAN LONGYEAR (SBN 84189)
10 NICOLE M. CAHILL (SBN 287165)
3620 American River Drive, Suite 230
11 Sacramento, CA 95864
Telephone: (916) 974-8500
12 Facsimile: (916) 974-8510
Attorneys for Defendants
13 COUNTY OF SACRAMENTO, DEPUTY
TINLEY SEITZ, DEPUTY ALEXANDER
14 EGENBERGER and DEPUTY JORDAN LEE

LAW OFFICES OF MILES, SEARS
& EANNI
A PROFESSIONAL CORPORATION
DOUGLAS L. GORDON, ESQ. (SBN 163992)
MEGAN K. CROSBIE, ESQ. (SBN 285865)
2844 FRESNO STREET
P.O. BOX 1432
FRESNO, CALIFORNIA 93716
Telephone: (559) 486-5200
Attorneys for Plaintiff
Luis Alberto Mendez Jimenez

15 UNITED STATES DISTRICT COURT

16 EASTERN DISTRICT OF CALIFORNIA, SACRAMENTO DIVISION

17 LUIS ALBERTO MENDEZ JIMENEZ,

18 Plaintiff,

19 v.

20 COUNTY OF SACRAMENTO; THE
REGENTS OF THE UNIVERSITY OF
21 CALIFORNIA; GREGORY SOKOLOV,
M.D.; DANIELLE DASS, LCSW;
22 CHARLENE WILLIAMS, N.P.; ANDREA
JAVIST; DEPUTY SHERIFF TINELEY
23 SIETZ; DEPUTY SHERIFF ALEXANDER
EGENBERGER; DEPUTY SHERIFF
24 JORDAN LEE; and Does 1-20, Inclusive,

25 Defendants.
26

Case No. 2:18-cv-00044-JAM-KJN

**STIPULATION AND ORDER RE:
EXTENSION OF EXPERT DISCOVERY
DEADLINES**

Complaint filed: January 09, 2018

Trial Date: February 03,2020

27 ///

28 ///

1 **IT IS HEREBY STIPULATED BY THE PARTIES TO ACTION NO. 2:18-CV-00044-JAM-**
2 **KJN AS FOLLOWS:**

3 On January 9, 2018, plaintiff Luis Alberto Mendez Jimenez filed the instant action against
4 defendants THE REGENTS OF THE UNIVERSITY OF CALIFORNIA; GREGORY SOKOLOV,
5 M.D.; DANIELLE DASS, LCSW; CHARLENE WILLIAMS, N.P.; ANDREA JAVIST; COUNTY
6 OF SACRAMENTO, DEPUTY TINLEY SEITZ, DEPUTY ALEXANDER EGENBERGER and
7 DEPUTY JORDAN LEE (hereafter, collectively referred to as “defendants”);

8 On June 14, 2018, the court filed its Status (Pretrial Scheduling) Order setting forth all the
9 operative dates governing scheduling of events in this case. In its order, the court ordered expert
10 disclosures under Federal Rule of Civil Procedure 26(a)(2) to take place by June 28, 2019.
11 Supplemental disclosures and disclosure of rebuttal experts under Federal Rule of Civil Procedure
12 26(a)(2)(c) were to be made by July 12, 2019. The court further ordered that all discovery, including
13 all depositions, be completed by August 30, 2019; and

14 The parties to this action have been working diligently to complete discovery but it
15 has come to light that it will be difficult, if not impossible, to complete (1) an independent medical
16 examination (“IME”) of plaintiff LUIS ALBERTO MENDEZ JIMENEZ, (2) the disclosure of expert
17 reports, and (3) the depositions of experts by the above dates.

18 Given the foregoing, the parties have met and conferred and hereby stipulate to an extension of
19 the expert discovery deadlines as follows:

- 20 1. Extend expert disclosure from June 28, 2019 to July 19, 2019; and
- 21 2. Extend supplemental expert and rebuttal expert disclosure date from July 12, 2019 to
22 August 2, 2019.

23 All other discovery deadlines, including the current August 30, 2019 discovery cutoff date, the
24 law and motion dates, and the February 3, 2020 trial date shall remain in effect.

25 ///
26 ///
27 ///
28 ///

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

ATTESTATION REGARDING SIGNATURES

I, Bianca S. Samuel, hereby attest that all other signatories listed, and on whose behalf the filing is submitted, concur in the filings content and have authorize the filing.

Date: June 7, 2019

/s/ Bianca S. Samuel
Bianca S. Samuel

