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14 *Attorney for Plaintiffs*

15
 16 **UNITED STATES DISTRICT COURT**
 17 **EASTERN DISTRICT OF CALIFORNIA**

18 DANIEL BARRERA, et al.

19 Plaintiffs,

20 vs.

21 CITY OF WOODLAND, et al.,

22 Defendants.

CASE NO. 2:18-cv-00329-JAM-KJN

JOINT STIPULATION AND ORDER
ADJUSTING EXPERT DISCLOSURE
DEADLINES

Joint Stipulation

1
2 The parties hereby stipulate to and request an Order modifying the Pretrial Scheduling
3 Order (ECF No. 60) as to expert disclosures only, extending the deadlines by two weeks.

4 A previous stipulation, which was granted, moved the deadlines by two weeks, and this
5 stipulation would add an additional two weeks, bringing the total departure from the original
6 schedule to one month. This proposed change will not affect the September 24, 2021 discovery
7 deadline; the November 5, 2021, dispositive motion filing deadline; or trial set for April 11, 2022.

8 Currently, the parties are required to make Fed. R. Civ. P. 26(a)(2) expert witness
9 disclosures by **August 6, 2021**, and Fed. R. Civ. P. 26(a)(2)(c) supplemental and rebuttal expert
10 witness disclosures by **August 20, 2021**. The parties propose to move these two deadlines by two
11 weeks, such that Fed. R. Civ. P. 26(a)(2) disclosures shall be made by **August 20, 2021**, and Fed.
12 R. Civ. P. 26(a)(2)(c) disclosures shall be made by **September 3, 2021**.

13 The requested change is chiefly to accommodate the schedule of a non-party witness,
14 namely the coroner who performed the autopsy on the decedent in this case. This witness resides
15 out of state and has a busy schedule, which the parties wish to accommodate. However, the parties
16 wish to accomplish his deposition before disclosing expert reports. An extension would help the
17 parties avoid causing undue inconvenience or hardship to this third-party witness. The parties
18 submit that good cause exists to grant this extension because the parties agree, no party will be
19 prejudiced, the grounds are reasonable, and because the no other aspect of the pretrial schedule
will be affected.

20 //

1 A proposed order is submitted below.

2 **SO STIPULATED.**

3

4 Dated: July 20, 2021

ANGELO, KILDAY & KILDUFF, LLP

5

s/ Derick E. Konz¹

6

By: _____

BRUCE A. KILDAY

7

DERICK E. KONZ

8

Attorneys for Defendants

9

10 Dated: July 20, 2021

**TAYLOR AND RING; LAW OFFICE OF
THOMAS C. SEABAUGH**

11

s/ Thomas C. Seabaugh

12

By: _____

13

NEIL K. GEHLAWAT

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THOMAS C. SEABAUGH

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Attorneys for Plaintiffs

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Proposed Order

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18 The Pretrial Scheduling Order (ECF No. 60) is modified such that Fed. R. Civ. P. 26(a)(2)
19 disclosures shall be made by **August 20, 2021**, and Fed. R. Civ. P. 26(a)(2)(c) disclosures shall be
20 made by **September 3, 2021**.

21

SO ORDERED.

22

23 Dated: July 20, 2021

/s/ John A. Mendez

24

THE HONORABLE JOHN A. MENDEZ

25

UNITED STATES DISTRICT COURT JUDGE

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¹ Authorized via email 7/19/2021 at 1:49 pm.