

1 LONGYEAR & LAVRA, LLP
2 Van Longyear, CSB No. 84189
3 Nicole M. Cahill, CSB No. 287165
4 3620 American River Drive, Suite 230
5 Sacramento, CA 95864
6 Phone: (916) 974-8500
7 Facsimile: (916) 974-8510

8 Attorneys for Defendant COUNTY OF SACRAMENTO

9 JOHN L. BURRIS, Esq., SBN 69888
10 ADANTE POINTER, Esq., SBN 236229
11 MELISSA NOLD, Esq., SBN 301378
12 LAW OFFICES OF JOHN L. BURRIS
13 Airport Corporate Centre
14 7677 Oakport Street, Suite 1120
15 Oakland, California 94621
16 Telephone: (510) 839-5200
17 Facsimile: (510) 839-3882

18 Attorneys for Plaintiffs

19 **UNITED STATES DISTRICT COURT**
20 **FOR THE EASTERN DISTRICT OF CALIFORNIA**

21 N.M., SUCCESSOR-IN-INTEREST TO)
22 DECEDENT MIKEL MCINTYRE, BY AND)
23 THROUGH HIS GUARDIAN AD LITEM,)
24 CAS'SIUS HUDSON; BRIGETT)
25 MCINTYRE, AN INDIVIDUAL,)

26 Plaintiffs,)

27 vs.)

28 CITY OF RANCHO CORDOVA, A)
MUNICIPAL CORPORATION; COUNTY)
OF SACRAMENTO, A MUNICIPAL)
CORPORATION; AND DOES 1-25,)
INCLUSIVE, INDIVIDUALLY AND IN)
THEIR OFFICIAL CAPACITY AS POLICE)
OFFICERS FOR THE CITY OF RANCHO)
CORDOVA AND COUNTY OF)
SACRAMENTO; AND DOES 26-50,)
INCLUSIVE, INDIVIDUALLY AND IN)
THEIR OFFICIAL CAPACITY AS)
EMPLOYEES FOR THE SACRAMENTO)
COUNTY SHERIFF'S DEPARTMENT)
AND/OR RANCHO CORDOVA POLICE)
DEPARTMENT,)

Defendants.)

Case No. 2:18-CV-01830-WBS-KJN

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

1 IT IS HEREBY STIPULATED BY THE PARTIES TO ACTION 2:18-CV-01830-WBS-KJN AS
2 FOLLOWS:

3 On June 26, 2018, Plaintiffs filed an instant action against Defendant COUNTY OF
4 SACRAMENTO.

5 On December 7, 2018, the court filed its Status (Pretrial Scheduling) Order setting forth
6 the operative dates governing scheduling of events in this case. In its order, the court ordered
7 expert disclosures under Federal Rule of Civil Procedure 26(a)(2) to take place by no later than
8 November 1, 2019. Disclosure of rebuttal experts under Federal Rule of Civil Procedure 26(a)(2)
9 on or before December 6, 2019. The court further ordered that all discovery, including all
10 depositions, be completed by January 6, 2020.

11 The parties to this action have been working diligently through discovery and have a
12 mediation currently set for October 16, 2019.

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

- 15 1. Extend expert disclosure from November 1, 2019 to January 6, 2020.
- 16 2. Extend rebuttal expert disclosure from December 6, 2019 to February 3, 2020.
- 17 3. Extend close of expert discovery to February 17, 2020.
- 18 4. No change to any other scheduled date is currently sought.

19 It is hereby stipulated by and between the parties through their respective counsel of record
20 that the expert discovery and discovery deadlines may be extended as set forth above, subject to
21 approval of the court.

22
23 Dated: October 9, 2019

LONGYEAR & LAVRA, LLP

24 By: /s/ Nicole M. Cahill

VAN LONGYEAR

NICOLE M. CAHILL

Attorneys for Defendants

1 Dated: October 9, 2019

LAW OFFICES OF JOHN L. BURRIS

2
3 By: /s/ Melissa C. Nold
4 JOHN L. BURRIS
5 ADANTE POINTER
6 MELISSA C. NOLD
7 Attorneys for Plaintiffs
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

