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6 Attorneys for Defendants
 CITY OF REDDING, JOE ROSSI, JAY GUTERDING, and
 7 BRETT LEONARD

8 UNITED STATES DISTRICT COURT
 9 EASTERN DISTRICT OF CALIFORNIA

11 R.H., a minor, by and through her
 guardian ad litem, Sheila Brown;
 12 ESTATE OF ERIC JAY HAMES, by and
 through its personal representative, Crystal
 13 Dunlap-Bennett,

14 Plaintiff,

15 v.

16 CITY OF REDDING, a public entity; JOE
 ROSSI, an individual; KIP KINNEAVY,
 17 an individual; JAY GUTERDING, an
 individual; BRETT LEONARD, an
 18 individual; and DOES 5 through 20
 inclusive,

19 Defendants.
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Case No. 2:20-CV-01435-WBS-DMC

**STIPULATION AND ORDER TO EXTEND
 DISCOVERY DATES**

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1 IT IS HEREBY STIPULATED, and respectfully requested, by and between Plaintiffs
2 R.H., a minor, by and through her guardian ad litem, Sheila Brown, and ESTATE OF ERIC JAY
3 HAMES, by and through its personal representative, Crystal Dunlap-Bennet (hereinafter,
4 collectively “Plaintiffs”) and Defendants CITY OF REDDING, JOE ROSSI, KIP KINNEAVY,
5 JAY GUTERDING and BRETT LEONARD (hereinafter, collectively “Defendants”) by and
6 through their designated counsel, that:

7 WHEREAS, on July 17, 2020, Plaintiffs filed their Complaint (Dkt. No. 1);

8 WHEREAS, on August 10, 2020, Plaintiffs filed their First Amended Complaint (Dkt.
9 No. 8);

10 WHEREAS, on September 14, 2020, Defendants City of Redding, Joe Rossi, Jay
11 Guterding and Brett Leonard filed their Answer (Dkt. No. 10);

12 WHEREAS, on November 13, 2020, Defendant Kip Kinneavy filed his Answer (Dkt. No.
13 14);

14 WHEREAS, on November 16, 2020, the Court issued the Pre-Trial Scheduling Order
15 (Dkt. No. 16);

16 WHEREAS, the Parties did proceed as best able by Zoom depositions, but have been
17 delayed in retaining and completing discovery because of Covid;

18 WHEREAS, counsel for Defendants City of Redding, Joe Rossi, Jay Guterding and Brett
19 Leonard, Mr. Dale Allen, and counsel for Plaintiffs, Mr. Neil Gehlawat, are completing expert
20 depositions in a trial set for August 17, 2021 in Shasta Superior Court with Judge Stephen Baker
21 further causing delays in completing discovery;

22 WHEREAS, this is the first request for an extension on the case management schedule
23 and for the limited purposes of continuing discovery dates;

24 WHEREAS, the current discovery schedule is set as:

25	Discovery Cut-Off: (Inclusive of all expert depositions)	September 24, 2021
26	Expert Witness Disclosures:	July 30, 2021
27	Rebuttal Expert Witness Disclosures:	August 27, 2021; and
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1 WHEREAS, the Parties met and conferred and agreed to extend discovery dates and set
2 the case schedule as proposed below:

3 Discovery Cut-Off: October 15, 2021
4 (Inclusive of all expert depositions)

5 Expert Witness Disclosure: September 10, 2021

6 Rebuttal Expert Witness Disclosure: September 27, 2021

7 **IT IS SO AGREED.**

8 Dated: July 14, 2021

9
10 By: /s/ Neil K. Gehlawat
11 NEIL K. GEHLAWAT
12 Attorneys for Plaintiffs
13 R.H., a minor, by and through her guardian ad
14 litem, Sheila Brown; ESTATE OF ERIC JAY
15 HAMES, by and through its personal
16 representative, Crystal Dunlap-Bennett,

17 Dated: July 14, 2021

18
19 By: /s/ Dale L. Allen, Jr.
20 DALE L. ALLEN, JR.
21 Attorneys for Defendants
22 CITY OF REDDING, JOE ROSSI, JAY
23 GUTERDING, AND BRETT LEONARD

24 Dated: July 14, 2021

25
26 By: /s/ Gary G. Goyette
27 GARY G. GOYETTE
28 Attorney for Defendant
KIP KINNEAVY

IT IS SO ORDERED.

Dated: July 19, 2021


DENNIS M. COTA
UNITED STATES MAGISTRATE JUDGE

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