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UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

ADAM BLANKENSHIP,

Plaintiff,

vs.

CITY OF SACRAMENTO,

Defendant.

Case No.: 2:23-cv-00610-KJM-CKD

STIPULATION AND ORDER TO EXTEND EXPERT DISCOVERY AND DISPOSITIVE MOTION DEADLINES

The Parties, Plaintiff Adam Blankenship and Defendant City of Sacramento hereby stipulate, through their respective counsel of record, to the below based upon the following good cause:

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1. Existing Due Date and Deadlines and Proposed New Deadlines (per Document 4-1 ("Standing Order"), No. 8 (A)).

	Current Deadline	Proposed New Deadline
Initial Expert Disclosure	June 24, 2024	November 18, 2024
Rebuttal Witness Disclosure	July 15, 2024	December 16, 2024
Expert Discovery Close	October 21, 2024	February 7, 2025
Dispositive Motion Deadline	November 20, 2024	March 10, 2025
Trail Date	Not Set	Not Set

2. Good Cause for Granting the Extension (per Standing Order No. 8 (B):

The Parties have diligently pursued discovery. Each party has conducted written discovery, including interrogatories and requests for production of documents, and the parties are in the process of conducting fact depositions, including depositions of Plaintiff's medical treaters, which are not yet completed. Those treaters were not discovered until Plaintiff's deposition which took place on May 10 and May 14, 2024. The parties are also in process of reviewing other witness deposition transcripts, some of which are not yet available. The parties each need to complete fact discovery and have the transcripts in order to interview, select, and prepare expert witnesses.

Additionally, the parties are currently engaged in settlement discussions and preparing for an ADR session through the court-sponsored VDRP. The parties are working with neutral Terry Wills. The selected mediation date is September 12, 2024. This was the first mutually available date for counsel, clients, and Ms. Wills. Moving the expert witness discovery deadlines until after mediation will facilitate settlement by eliminating potential significant expert witness costs for each party.

The Parties have agreed to the modification of the discovery schedule in section 1 above.

3. Prior Requests for Extensions (per Standing Order No. 8 (C): The parties jointly made one (1) request for a discovery extension in this matter, on April 18, 2024. (See

Document 17, "Stipulation and Proposed Order to Extend Discovery Deadline"). In the prior request, the Court granted the request to extend the fact discovery deadline from May 10, 2024 to June 10, 2024, and to extend the initial expert disclosure deadline from June 17, 2024 to June 24, 2024. The extension was granted.

DATED: May 30, 2024

THE VELEZ LAW FIRM, PC

By: */s/ Natalya V. Grunwald*
NATALYA V. GRUNWALD

Attorneys for Plaintiff
ADAM BLANKENSHIP

DATED: May 30, 2024

SUSANA ALCALA WOOD,
City Attorney

By: */s/ DAVID J. GIBSON*
DAVID J. GIBSON
Senior Deputy City Attorney

Attorneys for the
CITY OF SACRAMENTO

ORDER

The Court, having reviewed the stipulation of the parties, finds good cause to order as follows:

1. The initial expert disclosure deadline shall be continued from June 24, 2024 to November 18, 2024.
2. The rebuttal expert disclosure shall be continued from July 15, 2024 to December 16, 2024.
3. The expert discovery deadline shall be continued from October 21, 2024 to February 7, 2025.
4. The dispositive motion deadline shall be continued from November 20, 2024 to March 10, 2025.

5. All other discovery deadlines and motion deadlines shall remain unchanged.

IT IS SO ORDERED.

DATED: June 5, 2024.

CHIEF UNITED STATES DISTRICT JUDGE