

1 Gregory M. Fox, State Bar No. 070876
 Joanne Tran, State Bar No. 294402
 2 BERTRAND, FOX, ELLIOT, OSMAN & WENZEL
 The Waterfront Building
 3 2749 Hyde Street
 4 San Francisco, California 94109
 Telephone: (415) 353-0999
 5 Facsimile: (415) 353-0990
 E-mail: gfox@bfesf.com

6
 7 Attorneys for Defendants
 County of Lake, Sherriff Brian Martin, Captain Greg Hosman,
 8 Sergeant Renee Leffler, Officer James Rhine, Officer Douglas
 Aleman, Officer Jared McColough, Officer Joshua Phillipi,
 9 Deputy Kalen Brockwalder, Deputy Michael Davis

10
 11 UNITED STATES DISTRICT COURT
 12 NORTHERN DISTRICT OF CALIFORNIA

13 DANE SHIKMAN,
 14 Plaintiff,

15 v.

16 COUNTY OF LAKE; COUNTY OF LAKE
 17 SHERIFF BRIAN MARTIN; CAPTAIN
 GREG HOSMAN; SERGEANT RENEE
 18 LEFFLER; OFFICER JAMES RHINE;
 OFFICER DOUGLAS ALEMAN; OFFICER
 19 KATHERINE PRINCE; OFFICER JARED
 MCCOLOUGH; OFFICER JOSHUA
 20 PHILLIPI; DEPUTY KALEN BROCK
 WALDER; DEPUTY MICHAEL DA VIS;
 21 CALIFORNIA FORENSIC MEDICAL
 GROUP; TAYLOR FITHIAN, M.D.; ROBBIN
 22 BRIGGS; MONIQUE QUILLEN; MANDY
 ROBBINS; ALISHA STOTTSBERRY; and
 23 DOES 1-50,;

24
 25 Defendants.

Case No. 1:16-cv-05121-NJV

**STIPULATION AND ~~PROPOSED~~ ORDER TO
 CONTINUE FACT DISCOVERY CUTOFF AND
 OTHER DEADLINES**

MAGISTRATE JUDGE NANDOR J. VADAS

1 Rebuttal experts: Jan. 12, 2018
2 Expert discovery cutoff: Feb. 16, 2018
3 Dispositive motions due: Feb. 28, 2018
4 Dispositive motions oppositions due: March 26, 2018
5 Dispositive motions replies due: Apr. 9, 2018
6 Dispositive motions Hearing: Apr. 20, 2018
7 Trial: remains the same - June 4, 2018

8 7. Good cause exist for this extension of these deadlines because of scheduling difficulties
9 with four different law firms and the high number of deponents and their schedules. Furthermore, the
10 Order for mental health providers to produce decedent Ms. Elizabeth Gaunt's mental health records was
11 signed and filed on July 28, 2017 and the parties have not yet received the records. The parties will need
12 additional time to review the records and possibly depose additional mental health providers.

13 8. The parties respectfully request that the Court approve this stipulation and incorporate its
14 terms in an Order.

15 **IT IS SO STIPULATED.**

16
17 Dated: August 16, 2017

ABBEY, WEIZENBERG, WARREN & EMERY

18
19 By: /s/ Michael D. Green

Michael D. Green
Matthew R. Lilligren
Attorneys for Plaintiff
DANE SHIKMAN

20
21
22
23 Dated: August 16, 2017

SPINELLI, DONALD & NOTT

24 By: /s/ Domenic Spinelli

Domenic Spinelli
Attorneys for Defendant
OFFICER KATHERINE PRINCE

1 Dated: August 16, 2017

BERTRAND, FOX, ELLIOT, OSMAN & WENZEL

2 By: /s/ Joanne Tran

3 Gregory M. Fox

4 Joanne Tran

5 Attorneys for Defendants

6 COUNTY OF LAKE, SHERIFF BRIAN

7 MARTIN, CAPTAIN GREG HOSMAN,

8 SERGEANT RENEE LEFFLER, OFFICER

9 JAMES RHINE, OFFICER DOUGLAS

10 ALEMAN, OFFICER JARED MCCOLLOUGH,

11 OFFICER JOSHUA PHILLIPI, DEPUTY

12 KALEN BROCKWALDER, DEPUTY

13 MICHAEL DAVIS

14 Dated: August 16, 2017

LAW OFFICES OF JEROME M. VARANINI

15 By: /s/Jerome M. Varanini

16 Jerome M. Varanini

17 Attorneys for Defendants

18 CALIFORNIA FORENSIC MEDICAL GROUP,

19 TAYLOR FITHIAN, M.D., ROBBIN BRIGGS,

20 MONIQUE QUILLEN, MANDY ROBBINS,

21 ALISHA STOTTSBERRY

22 **ATTORNEY ATTESTATION**

23 I, Joanne Tran, am the ECF user whose identification and password are being used to file the
24 foregoing documents. Pursuant to Civil Local Rule 5.1(i), I hereby attest that the concurrence in the filing
25 of these documents have been obtained from each of its Signatories.

26 Dated: August 16, 2017

27 By: /s/ Joanne Tran

28 Joanne Tran

ORDER

GOOD CAUSE APPEARING THEREFORE, and the parties' having stipulated to the same, the
parties' stipulation is hereby APPROVED. The new deadlines are as follows:

Fact discovery cutoff: Nov. 17, 2017

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

Expert disclosures: Dec. 18, 2017
Rebuttal experts: Jan. 12, 2018
Expert discovery cutoff: Feb. 16, 2018
Dispositive motions due: Feb. 28, 2018
Dispositive motion oppositions due: March 26, 2018
Dispositive motion replies due: Apr. 9, 2018
Dispositive motions Hearing: Apr. 20, 2018
Trial: remains the same - June 4, 2018

IT IS SO ORDERED.

DATED: 8/21/2017


MAGISTRATE JUDGE NANDOR J. VADAS
United States Magistrate Judge