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 17 T.A. WOOD

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 19 UNITED STATES DISTRICT COURT  
 20 NORTHERN DISTRICT OF CALIFORNIA

21 RAYMOND J. MANZANILLO,

22 Plaintiff,

23 v.

24 GREGORY D. LEWIS, et al.,

25 Defendants.  
 26

Case No. 3:12-cv-05983-JST

**STIPULATION TO MODIFY SCHEDULING  
 ORDER**

1 Plaintiff Raymond Manzanillo (“Plaintiff”) and Defendants N. Brown, Gregory D. Lewis, J.  
2 Hallock, K. McGuyer, Matthew Cate, and T.A. Wood (“Defendants”) (collectively the “Parties”) by and  
3 through their counsel hereby stipulate and jointly request the Court to modify the Scheduling Order  
4 issued on March 4, 2016 (Dkt. No. 178), by extending all deadlines by approximately sixty (60) days.

5 The Parties cannot complete the depositions necessary in this case before the current June 3,  
6 2016 cut-off for fact discovery. The Parties have made significant progress regarding written discovery  
7 and the production of documents. Additionally, Plaintiff is scheduled to depose three Defendants this  
8 month. However, the Parties have been unable to schedule additional necessary depositions as a result  
9 of Plaintiff’s counsel’s schedules, unexpected delays regarding Defendants’ availability for depositions,  
10 and logistical challenges stemming from certain Defendants’ and witnesses’ moving out of state or being  
11 transferred to different correctional facilities. Similarly, the Parties are working to schedule Plaintiff’s  
12 deposition but have encountered logistical delays due to Plaintiff’s recent transfer from the facility at  
13 Corcoran to Kern Valley State Prison.

14 To ensure that the Parties are able to complete all of the depositions and accommodate the  
15 schedules of the Parties and the witnesses, the Parties stipulate and jointly request the Court to extend all  
16 deadlines, including the trial date, by approximately sixty (60) days (or the next court day assuming the  
17 new date falls on a weekend or holiday). Accordingly, the Parties propose the following schedule:

<b>Event</b>	<b>Date</b>
Fact discovery cut-off	August 5, 2016
Expert disclosures	August 26, 2016
Expert rebuttal	September 16, 2016
Expert discovery cut-off	September 30, 2016
Deadline to file dispositive motions	October 21, 2016
Pretrial conference statement due	January 10, 2017
Pretrial conference	January 19, 2017, at 2:00 p.m.
Trial	February 6, 2017, at 8:30 a.m.

1                   **IT IS SO STIPULATED.**

2 DATED: May 11, 2016

Respectfully submitted,  
3 SEYFARTH SHAW LLP

4  
5 By: /s/ Jason M. Allen  
6 Francis J. Ortman III  
7 Aryeh M. Hersher  
8 Jason M. Allen  
9 Michael A. Wahlander

10 Attorneys for Plaintiff  
11 RAYMOND J. MANZANILLO

12 DATED: May 11, 2016

Respectfully submitted,  
13 MCNAMARA LAW FIRM

14 By: /s/ William Lee McCaslin  
15 Peter Jon Hirsig  
16 William Lee McCaslin

17 Attorneys for Defendant  
18 N. BROWN

19 DATED: May 11, 2016

Respectfully submitted,  
20 CALIFORNIA STATE ATTORNEY  
21 GENERAL'S OFFICE

22 By: /s/ Michael James Quinn  
23 Michael James Quinn

24 Attorneys for Defendants  
25 GREGORY D. LEWIS; J. HALLOCK;  
26 K. MCGUYER; MATTHEW CATE AND  
27 T.A. WOOD  
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**ATTESTATION PURSUANT TO LOCAL RULE 5-1(i)(3)**

I, Jason M. Allen, attest that concurrence in the filing of this stipulation has been obtained from the signatories, William Lee McCaslin and Michael James Quinn, counsel for Defendants.

Executed this 11th day of May 2016, in San Francisco, CA.

/s/ Jason M. Allen

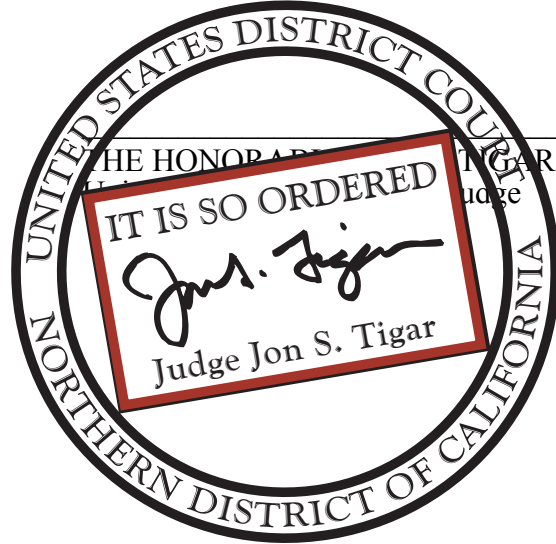
Jason M. Allen

**~~PROPOSED~~ ORDER**

Pursuant to the Parties' stipulation and good cause appearing, the Scheduling Order [ECF No. 178] is amended to reflect the dates set forth in the Parties' stipulation.

IT IS SO ORDERED.

Dated: May 18, 2016



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