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16 Attorneys for Defendants  
 GREGORY D. LEWIS; J. HALLOCK; K. MCGUYER; MATTHEW CATE AND  
 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 extend certain deadlines in the  
4 Scheduling Order issued on May 18, 2016 (Dkt. No. 190).

5 As noted in the Parties’ previous request for leave to take certain depositions after the current  
6 fact discovery cut-off (Dkt. No. 196), the Parties intend to conduct a site visit of facilities at Pelican Bay  
7 State Prison and to depose Defendant Kurt McGuyer, Correctional Lieutenant John Diggie, Correctional  
8 Sergeant B. Grenert, and a representative of the California Department of Corrections and Rehabilitation  
9 (“CDCR”) under Federal Rule of Civil Procedure 30(b)(6). Due to the Parties’ schedules and the  
10 availability of the intended deponents, the Parties cannot complete those depositions or the site visit  
11 before the current fact discovery cut-off of August 5, 2016. Accordingly, the Parties request that the  
12 Court extend the fact discovery cut-off by approximately thirty (30) days, to September 2, 2016.

13 Additionally, because the information obtained through those depositions and the site visit will  
14 likely be relevant for experts analyzing issues in this case, the Parties request that the Court extend the  
15 deadlines for expert disclosures, rebuttal disclosures, and expert discovery by approximately fourteen  
16 (14) days, to September 9, 30, and October 14, respectively.

17 Accordingly, the Parties propose the following schedule:

<b>Event</b>	<b>Date</b>
Fact discovery cut-off	September 3, 2016
Expert disclosures	September 9, 2016
Expert rebuttal	September 30, 2016
Expert discovery cut-off	October 14, 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: August 1, 2016

Respectfully submitted,  
SEYFARTH SHAW LLP

5 By: /s/ Michael A. Wahlander  
Francis J. Ortman III  
Aryeh M. Hersher  
Jason M. Allen  
Michael A. Wahlander

8 Attorneys for Plaintiff  
RAYMOND J. MANZANILLO

9  
10 DATED: August 1, 2016

Respectfully submitted,  
MCNAMARA LAW FIRM

13 By: /s/ William Lee McCaslin  
Peter Jon Hirsig  
William Lee McCaslin

15 Attorneys for Defendant  
N. BROWN

16  
17 DATED: August 1, 2016

Respectfully submitted,  
CALIFORNIA STATE ATTORNEY  
GENERAL'S OFFICE

20 By: /s/ Michael James Quinn  
Michael James Quinn

22 Attorneys for Defendants  
GREGORY D. LEWIS; J. HALLOCK;  
23 K. MCGUYER; MATTHEW CATE AND  
T.A. WOOD

1  
2 **ATTESTATION PURSUANT TO LOCAL RULE 5-1(i)(3)**

3 I, Michael A. Wahlander, attest that concurrence in the filing of this stipulation has been  
4 obtained from the signatories, William Lee McCaslin and Michael James Quinn, counsel for  
5 Defendants.

6 Executed this 1st day of August 2016, in San Francisco, CA.

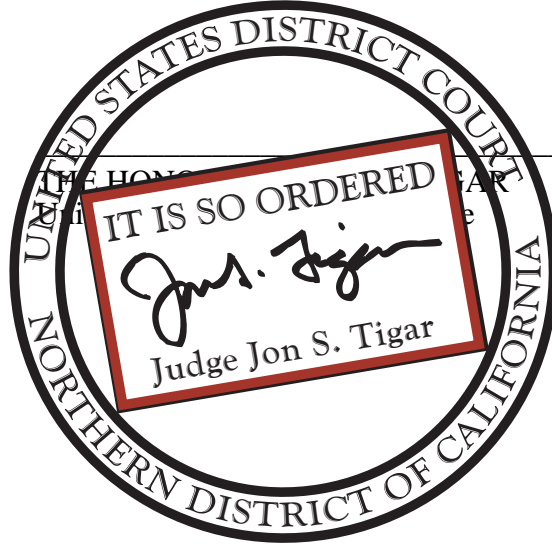
7 /s/ Michael A. Wahlander  
8 Michael A. Wahlander  
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**~~PROPOSED~~ ORDER**

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: August 1, 2016



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