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17 Attorneys for Defendants  
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 18 MATTHEW CATE AND T.A. WOOD

19  
 20 UNITED STATES DISTRICT COURT  
 21 NORTHERN DISTRICT OF CALIFORNIA

22  
 23 RAYMOND J. MANZANILLO,

24 Plaintiff,

25 v.

26 GREGORY D. LEWIS, et al.,

27 Defendants.  
 28

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

**STIPULATION AND ~~PROPOSED~~  
 ORDER TO EXTEND DAMAGES  
 EXPERT DISCOVERY DEADLINE**

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 as follows:

- 4 1. The current deadline to complete damages expert discovery is December 30, 2016.
- 5 2. The Parties have worked together to schedule depositions of their respective designated  
6 experts. Because of the holidays, those experts are not available for deposition until the  
7 week of January 3, 2017, which is after the current damages expert discovery deadline.
- 8 3. To allow for the completion of depositions, the Parties agree to extend the damages  
9 expert deadline until January 6, 2017. No other dates shall be changed, other than the  
10 corresponding discovery motion deadline associated with the damages expert discovery  
11 deadline in accordance with the Local Rules.

12 **IT IS SO STIPULATED.**

13 DATED: December 21, 2016

Respectfully submitted,  
SEYFARTH SHAW LLP

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

19 Attorneys for Plaintiff  
RAYMOND J. MANZANILLO

21 DATED: December 21, 2016

Respectfully submitted,  
MCNAMARA LAW FIRM

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

26 Attorneys for Defendant  
N. BROWN

1 DATED: December 21, 2016

Respectfully submitted,

2 CALIFORNIA STATE ATTORNEY  
3 GENERAL'S OFFICE

4  
5 By: /s/ Michael L. Huggins  
Michael L. Huggins

6 Attorneys for Defendants  
7 GREGORY D. LEWIS; J. HALLOCK;  
8 K. MCGUYER; MATTHEW CATE AND  
T.A. WOOD

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

10 I, Michael A. Wahlander, attest that concurrence in the filing of this stipulation has been  
11 obtained from the signatories, William Lee McCaslin and Michael L. Huggins counsel for Defendants.

12 Executed this 21st day of December, 2016, in San Francisco, California.

13  
14 /s/ Michael A. Wahlander  
MICHAEL A. WAHLANDER

15  
16 **PROPOSED ORDER**

17 Pursuant to the Parties' stipulation and good cause appearing the Court orders as follows:

- 18 1. The Damages Expert Discovery Deadline is extended to January 6, 2017. No other dates  
19 shall be changed, other than the corresponding discovery motion deadline associated with  
20 the damages expert discovery deadline in accordance with the Local Rules.

21 **IT IS SO ORDERED.**

22  
23 Dated: December 29, 2016

24   
HON. JON S. TIGAR  
United States District Court Judge