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6 Attorneys for Defendants the
 County of Mendocino and
 7 Mendocino County Sheriff-
 Coroner Thomas Allman,
 8 Capt. Timothy Pearce, Lorrie Knapp,
 Frank Masterson, Craig Bernardi,
 9 Michael Grant, Jeanette Holum,
 Robert Page, & Christine De Los Santos

10 UNITED STATES DISTRICT COURT
 11 NORTHERN DISTRICT OF CALIFORNIA

12 JAMES NEUROTH, *et al.*,
 13 Plaintiffs,
 14 v.
 15 MENDOCINO COUNTY, *et al.*,
 16 Defendants.

Case No. 3:15-CV-03226-RS

**JOINT STIPULATION TO MODIFY
 CASE MANAGEMENT SCHEDULING
 ORDER AND OTHER DATES;
 [PROPOSED] ORDER**

18 This Joint Stipulation to Modify Case Management Scheduling Order is submitted by all
 19 parties in this action, through their respective counsel, including: Plaintiff James Neuroth
 20 (“Plaintiff”); Defendants the County of Mendocino, Mendocino County Sheriff Thomas Allman,
 21 Sheriff’s Captain Timothy Pearce, and current/former Sheriff’s Deputies Lorrie Knapp, Frank
 22 Masterson, Craig Bernardi, Michael Grant, Jeanette Holum, Robert Page, and Christine De Los
 23 Santos (collectively, “County Defendants”); California Forensic Medical Group, Inc., Dr. Taylor
 24 Fithian, and LVN Jennifer Caudillo (collectively, “CFMG Defendants”); Correctional Medical
 25 Group Companies, Inc., RN Elaine Hustedt, and RN Claire Teske (collectively, “CMGC
 26 Defendants”); and the City of Willits, former Willits Police Chief Gerardo Gonzalez, and
 27 current/former Willits Police Officers Kevin Leef and Jeff Andrade (collectively, the “Willits
 28

1 Defendants”). Pursuant to this Stipulation, the parties jointly request the Court to modify the pretrial
2 dates set out in its previous Case Management Scheduling Order entered on December 13, 2017
3 (Dkt. No. 232, the “Scheduling Order”), as well as other dates, as set forth below.

4 **RECITALS**

5 A. The course and schedule of events in this case have caused the parties to reevaluate
6 the remaining dates set in the Court’s previous Scheduling Order (Dkt. No. 232), which are presently
7 as follows:

- 8 • August 30, 2018: Last day to conduct meet and confer session (per the
9 Court’s Jury Trial Standing Order, Section A).
- 10 • September 13, 2018: Last day to file Motions in Limine, and last day to
11 file Joint Pretrial Statement and Proposed Order (per the Court’s Jury
12 Trial Standing Order, Section B).
- 13 • October 4, 2018: Oppositions to Motions in Limine due
- 14 • October 18, 2018, at 10:00 a.m.: Final Pretrial Conference

15 B. The parties request the Court to revise the pretrial dates set out in the previous
16 Scheduling Order for the following reasons:

- 17 1. The Court’s request to revise the scheduling order due to the delay in the
18 hearing on the Motions for Summary Judgment.
- 19 2. The parties are mindful of the Court’s busy docket, and that it may take
20 considerable time for the Court to issue a summary judgment order after the hearing on those
21 motions.

22 WHEREFORE, the parties hereby agree and request entry of an order as follows:

23 **AGREEMENT**

24 1. The parties request the Court to consider modifying the scheduling guidelines set out
25 in its Jury Trial Standing Order in this case as follows:

- 26 a. September 12, 2018: Last day to conduct meet and confer session (per the
27 Court’s Jury Trial Standing Order, Section A).
- 28 b. October 18, 2018: Last day to file Motions in Limine, and last day to file
Joint Pretrial Statement and Proposed Order (per the Court’s Jury Trial

Standing Order, Section B).

- c. November 15, 2018: Oppositions to Motions in Limine due
- d. December 6, 2018, at 10:00 a.m.: Final Pretrial Conference

3. Nothing in this Stipulation and request for order is intended to modify the other matters addressed in any Court order unless expressly identified herein, nor does it preclude the parties from seeking additional relief from this Court, to amend this stipulation and order or otherwise.

IT IS SO STIPULATED.

Patton & Ryan LLC

Dated: August 28, 2018

By: /s/ Michael G. Vranicar
Michael G. Vranicar
Attorneys for County Defendants

Law Offices of Jerome M. Varanini

Dated: August 28, 2018

By: /s/ Jerome M. Varanini
Jerome M. Varanini
Attorneys for CFMG Defendants

Bertling Law Group, Inc.

Dated: August 28, 2018

By: /s/ Peter G. Bertling
Peter G. Bertling
Attorneys for CMGC Defendants

Perry, Johnson, Anders, Miller &
Moskowitz LLP

Dated: August 28, 2018

By: /s/ Scott A. Lewis
Scott A. Lewis
Attorneys for Willits Defendants

Haddad & Sherwin LLP

Dated: August 28, 2018

By: /s/ Michael J. Haddad
Michael J. Haddad
Attorneys for Plaintiff

* Approval in the filing of this document has been obtained from all signatories.

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ORDER

Based on the parties’ stipulation, and with good cause appearing therefore,

IT IS HEREBY ORDERED that the previous Case Management Scheduling Order entered on December 13, 2017 (Dkt. No. 232) is hereby modified, and that the following dates are set in the instant case:

- a. September 12, 2018: Last day to conduct meet and confer session (per the Court’s Jury Trial Standing Order, Section A).
- b. October 18, 2018: Last day to file Motions in Limine, and last day to file Joint Pretrial Statement and Proposed Order (per the Court’s Jury Trial Standing Order, Section B).
- c. November 15, 2018: Oppositions to Motions in Limine due
- d. December 6, 2018, at 10:00 a.m.: Final Pretrial Conference

IT IS SO ORDERED.

Date: 8/29/18



HONORABLE RICHARD SEEBORG
United States District Court Judge