

REED SMITH LLP  
A limited liability partnership formed in the State of Delaware

1 XAVIER BECERRA  
 Attorney General of California  
 2 WILLIAM C. KWONG  
 Supervising Deputy Attorney General  
 3 NECULAI GRECEA, State Bar No. 307570  
 PREETI K. BAJWA  
 4 Deputy Attorney General  
 State Bar No. 232484  
 5 455 Golden Gate Avenue, Suite 11000  
 San Francisco, CA 94102-7004  
 6 Telephone: (415) 703-1179  
 Fax: (415) 703-5843  
 7 E-mail: Preeti.Bajwa@doj.ca.gov  
*Attorneys for Defendants S. Cupp, J. Cuske,*  
 8 *D. Melton, K. Ohland, J. Vangilder, and J. Vasquez*

9 BRITT M. ROBERTS, State Bar No. 284805  
 Reed Smith, LLP  
 10 101 2nd Street, Suite 1800  
 San Francisco, CA 94105  
 11 Telephone: (415) 659-5651  
 Fax: (415) 391-8269  
 12 E-mail: tmoore@reedsmith.com  
*Attorney for Plaintiff Daniel Cisneros*

13 GERALD SINGLETON, State Bar No. 208783  
 14 BRODY A.MCBRIDE, State Bar No. 270852  
 Singleton Law Firm  
 15 115 W. Plaza Street  
 Solana Beach, CA 92075-1123  
 16 Telephone: (760) 697-1330  
 Fax: (760) 697-1329  
 17 E-mail: brody@slffirm.com  
*Attorneys for Plaintiff Daniel Manriquez*

18  
 19 UNITED STATES DISTRICT COURT  
 20 NORTHERN DISTRICT OF CALIFORNIA

22 DANIEL CISNEROS

23 Plaintiff,

24 vs.

25 VANGILDER, et al.,

26 Defendants.

No.: 4:16-cv-00735-HSG

**JOINT STIPULATION RE: EXTENSION  
 TO SCHEDULED DATES FOR EXPERT  
 DEPOSITIONS AND ORDER**

Judge: Hon. Haywood S. Gilliam Jr.  
 Courtroom: 2  
 Trial Date: Nov. 12, 2018

27  
 28 No.: 4:16-cv-00735-HSG

**JOINT STIPULATION RE: EXTENSION TO SCHEDULED DATES  
 FOR EXPERT DEPOSITIONS AND ORDER**

**JOINT STIPULATION**

1  
2 On July 3, 2018, this Court granted Plaintiffs’ Daniel Manriquez and Daniel Cisneros  
3 (“Plaintiffs”) Motion to Amend the Scheduling Order and continued Expert Discovery and all  
4 related deadlines by sixty (60) days. See ECF 75. Within that Order, the Court advised that  
5 pursuant to the July 3, 2018 telephonic conference, the parties will meet and confer for the purpose  
6 of proposing mutually agreeable dates for the final pretrial conference and trial, and will submit a  
7 stipulation and proposed order to that effect by July 13, 2018. During discussions with the Court  
8 concerning the Court’s Order, the Court additionally advised that if the parties agreed to new  
9 deposition dates of all experts in light of the sixty (60) day continuance to expert discovery, they  
10 should advise the Court by Joint Stipulation by July 6, 2018. The parties have reached agreement on  
11 new dates for all expert depositions and advise the Court of the following:

12 It is hereby STIPULATED, by and between the undersigned counsel, that Plaintiffs and  
13 Defendants<sup>1</sup> have agreed to move the deposition of Plaintiffs’ expert from July 9, 2018 to August 23,  
14 2018; and Defendants’ experts from July 12, 2018 to August 28, 2018.

15 DATED: July 11, 2018

16  
17 /s/ Preeti Bajwa  
18 Preeti Bajwa  
19 Deputy Attorney General  
20 *Attorneys for Defendants*  
21 *S. Cupp, J. Cuske, D. Melton,*  
22 *K. Ohland, J. Vangilder,*  
23 *and J. Vasquez*

24 DATED: July 11, 2018

25 /s/ Britt M. Roberts  
26 Britt M. Roberts  
27 Reed Smith, LLP  
28 *Attorney for Plaintiff Daniel Cisneros*

29 DATED: July 11, 2018

30 /s/ Brody A. McBride  
31 Brody A. McBride  
32 Singleton Law Firm  
33 *Attorney for Plaintiff Daniel Manriquez*

34  
35  
36  
37  
38 <sup>1</sup> Defendants S. Cupp, J. Cuske, D. Melton, K. Ohland, J. Vangilder, and J. Vasquez (“Defendants”).  
No.: 4:16-cv-00735-HSG – 1 –

1 **ORDER**

2 Upon considering the parties joint stipulation, it is hereby ordered that Plaintiffs' expert's  
3 deposition will be re-scheduled from July 9, 2018 to August 23, 2018; and Defendants' experts'  
4 depositions will be re-scheduled from July 12, 2018 to August 28, 2018.  
5

6 **IT IS SO ORDERED.**

7  
8 **DATED:** July 11, 2018

  
HON. HAYWOOD S. GILLIAM JR.

9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
REED SMITH LLP  
A limited liability partnership formed in the State of Delaware