

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

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18  
 19 UNITED STATES DISTRICT COURT  
 20 NORTHERN DISTRICT OF CALIFORNIA

22 DANIEL MANRIQUEZ  
 23 Plaintiff,  
 24 vs.  
 25 VANGILDER, et al.,  
 26 Defendants.

No.: 4:16-cv-01320-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-01320-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

DATED: July 11, 2018

/s/ Brody A. McBride  
Brody A. McBride  
Singleton Law Firm  
Attorney for Plaintiff Daniel Manriquez

<sup>1</sup> Defendants S. Cupp, J. Cuske, D. Melton, K. Ohland, J. Vangilder, and J. Vasquez (“Defendants”).  
No.: 4:16-cv-01320-HSG

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.

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