

1 KATHARINE L. ELLIOTT, County Counsel SBN 135253  
2 BRINA A. BLANTON, Deputy, SBN 260829  
3 County of Mendocino – Administration Center  
4 501 Low Gap Road, Room 1030  
5 Ukiah, CA 95482

6 Telephone: (707) 234-6885  
7 Facsimile: (707) 463-4592  
8 [blantonb@mendocinocounty.org](mailto:blantonb@mendocinocounty.org)

9 Attorneys for Defendants  
10 COUNTY OF MENDOCINO, THOMAS D. ALLMAN, LORRIE KNAPP, and MICHAEL  
11 GRANT

12 **UNITED STATES DISTRICT COURT**  
13 **NORTHERN DISTRICT OF CALIFORNIA**

14 MARGARET WARD, in her personal capacity, )  
15 and as executor of the estate of Earl Ward, )  
16 Deceased, KEVIN WARD and INA WARD, )  
17 surviving heir of JEFF WARD )

18 Plaintiffs, )

19 V. )

20 COUNTY OF MENDOCINO; SHERIFF )  
21 THOMAS D. ALLMAN, individually and in )  
22 his official capacity as Sheriff of the COUNTY )  
23 OF MENDOCINO; LORRIE KNAPP; )  
24 MICHAEL GRANT; CALIFORNIA )  
25 FORENSIC MEDICAL GROUP, INC.; DR. )  
26 MICHAEL MEDVIN; DR. MARVIN )  
27 TROTTER; KATHY LOUISE GOODMAN; )  
28 KINDRED HEALTHCARE OPERATING, )  
INC.; and DOES 1 through 100, inclusive. )

Defendants. )

Case No. 4:17-cv-00911-PJH

**STIPULATION AND ~~PROPOSED~~**  
**ORDER TO AMEND CASE**  
**MANAGEMENT AND PRETRIAL**  
**ORDER AS MODIFIED BY THE COURT**

WHEREAS the plaintiffs and defendants in this action have participated in a settlement scheduling conference under the guidance and recommendation of the assigned settlement

1 judge in this matter, the Hon. Laurel Beeler, and

2 WHEREAS the Case Management and Pretrial Order (Dkt. 31) was entered on June 19,  
3 2017, before plaintiffs filed their Third Amended Complaint (Dkt. 59) on February 1, 2018, to  
4 add two additional defendants, Kathy Louise Goodman as Doe Defendant 1 and Kindred  
5 Healthcare Operating, Inc. as Doe Defendant 2, and

6 WHEREAS defendant Kindred Healthcare Operating, Inc. first appeared in this matter  
7 on March 7, 2018, and

8 WHEREAS defendant Kathy Louise Goodman first appeared in this matter on April  
9 18, 2018, and

10 WHEREAS a settlement conference had been set for August 15, 2018, and

11 WEHREAS one of the Plaintiffs was diagnosed with a serious medical condition and  
12 will not be able to attend the August 15, 2018 settlement conference, and

13 WHEREAS the parties are currently working to continue the settlement conference to a  
14 date when all parties can be present, and

15 WHEREAS the non-expert discovery cutoff was reset to October 1, 2018, pursuant to  
16 the pretrial schedule set forth in the court's Case Management and Pretrial Order (Dkt. 85), and

17 WHEREAS all other deadlines originally set in this case remain and are as of the  
18 resetting of the non-expert discovery cutoff are incompatible with that date, and

19 WHEREAS the plaintiffs and defendants in this action are aware of the procedure for  
20 amending the court's Case Management and Pretrial Order (Dkt. 31) and have concurrently  
21 filed a letter brief with the court, in accordance with said procedure, and

22 WHEREAS good cause exists for an order amending the court's Case Management and  
23 Pretrial Order (Dkt. 31), as set forth above.

24 THE PARTIES HEREBY STIPULATE TO THE FOLLOWING PROPOSED CASE  
25 MANAGEMENT AND PRETRIAL ORDER:  
26

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

<b>Deadline/Hearing</b>	<b>Currently Due/Set</b>	<b>Proposed Due/Set</b>
Non-Expert Discovery Cut-off	October 1, 2018	<b>November 1, 2018</b>
Disclosure of Experts	August, 1, 2018	<b>November 30, 2018</b>
Rebuttal	August 31, 2018	<b>December 29, 2018</b>
Dispositive Motions	October 3, 2018	<b>January 3<sup>9</sup>, 2019</b>
Expert Discovery Cut-Off	November 11, 2018	<b>January 11, 2019</b>
Pretrial Conference	January 10, 2019	<b>August 15, 2019</b>
Trial	February 4, 2019	<b>September 9, 2019</b>

Dated: July 27, 2018

KATHARINE L. ELLIOTT  
County Counsel

By: \_\_\_\_\_/s/  
BRINA A. BLANTON, DEPUTY

Attorneys for Defendants  
COUNTY OF MENDOCINO, THOMAS  
ALLMAN, LORRIE KNAPP, and MICHAEL  
GRANT

Dated: July 27, 2018

J SUPPLE LAW  
A Professional Corporation

By: \_\_\_\_\_/s/  
JOHN L. SUPPLE  
JODIE C. FEUSNER  
MATTHEW SCHROEDER

Attorneys for Defendants  
KATHY LOUISE GOODMAN and  
KINDRED HEALTHCARE OPERATING,  
INC.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Dated: July 27, 2018

BRENT & FIOL, LLP

By: \_\_\_\_\_ /s/  
DAVID L. FIOL

Attorneys for Plaintiffs

Dated: July 27, 2018

THE LAW OFFICES OF JEROME M.  
VARANINI

By: \_\_\_\_\_ /s/  
JEROME M. VARANINI

Attorneys for Defendants  
CALIFORNIA FORENSIC MEDICAL  
GROUP, INC. and DR. MICHAEL MEDVIN

Dated: July 27, 2018

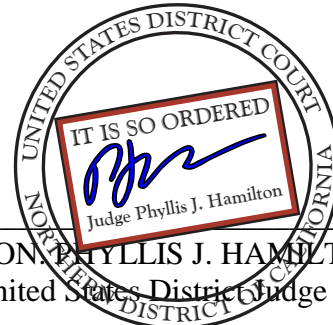
SCHUERING, ZIMMERMAN & DOYLE

By: \_\_\_\_\_ /s/  
THEODORE D. POPPINGA

Attorneys for Defendant  
DR. MARVIN TROTTER

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Dated: July 30, 2018



\_\_\_\_\_  
HON. PHYLLIS J. HAMILTON  
United States District Judge