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6 Attorneys for Defendants  
 NORTH COUNTY FIRE PROTECTION  
 7 DISTRICT OF MONTEREY COUNTY and  
 CHRIS ORMAN

8 UNITED STATES DISTRICT COURT  
 9 NORTHERN DISTRICT OF CALIFORNIA

11 JONATHAN RUSKELL,  
 12 Plaintiff,

13 v.

14 NORTH COUNTY FIRE  
 PROTECTION DISTRICT OF  
 15 MONTEREY COUNTY, a public  
 agency and/or municipal corporation;  
 16 CHRIS ORMAN, individually and  
 as Fire Chief; and DOES 1  
 17 THROUGH 10,

18 Defendants.

Case No. 15-cv-03540-BLF  
 Hon. Beth Labson Freeman

**SECOND REVISED JOINT  
 STIPULATION AND ~~PROPOSED~~  
 ORDER REGARDING PROPOSED  
 DISCOVERY AND PRE-TRIAL  
 CUT-OFF DATES**

20 Plaintiff Jonathan Ruskell (“Plaintiff”) and Defendants North County Fire  
 21 Protection District of Monterey County and Chris Orman (“Defendants”), by and  
 22 through their attorneys of record (collectively “Parties”), submit this Joint  
 23 Stipulation and Order regarding proposed discovery and pre-trial cut-off dates per  
 24 this Court’s January 21, 2016 order.

25 WHEREAS, on January 21, 2016 this Court set the trial date, pre-trial  
 26 conference, last day to commence mediation, and reserved a hearing date for  
 27 Motion for Summary Judgement; and

28 Case No.: 15-cv-03540-BLF

SECOND REVISED JOINT STIPULATION AND  
 [PROPOSED] ORDER REGARDING PROPOSED  
 DISCOVERY AND PRE-TRIAL CUT-OFF DATES

1 WHEREAS, the Court has ordered the Parties to provide additional proposed  
2 discovery and trial related cut off dates.

3 NOW, THEREFORE, the Parties hereby agree and stipulate to the following  
4 pre-trial and trial related dates and propose the same for this Court's consideration:  
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6 **PROPOSED SCHEDULE OF PRE-TRIAL AND TRIAL DATES**

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| <b>Matter</b>  | <b>Proposed Date</b>    |
|--|-------------------------|
| Last Day to Amend Pleadings<br>or Add New Parties                          | 2/29/2016               |
| Fact Discovery Cut-Off   | 2/10/2017               |
| Expert Disclosure (Initial)  | 6/9/2017                |
| Expert Disclosure (Rebuttal)   | 7/14/2017               |
| Expert Disclosure (Sur<br>Rebuttal)  | 7/28/2017               |
| Expert Discovery Cut-Off   | 8/11/2017               |
| Hearing Date for Motions for<br>Summary Judgment*                          | 10/19/2017 at 9:00 A.M. |
| Cut-Off for Hearings on Non-<br>Dispositive Motions<br>(Discovery Motions) | 9/7/2017                |
| Final Pretrial Conference*   | 1/11/2018 at 1:30 P.M.  |
| Trial – (5 days)*  | 2/5/2018 at 9:00 A.M.   |

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22 \*These dates have been set pursuant to the Court's Case Management Order  
23 entered 1/21/2016.  
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Dated: February 18, 2016

Respectfully submitted,  
FORD & HARRISON LLP

By: /Allison V. Saunders/  
Allison V. Saunders  
Lauren T. Williams  
Attorneys for Defendants

NORTH COUNTY FIRE PROTECTION  
DISTRICT OF MONTEREY COUNTY  
and CHRIS ORMAN

Dated: February 18, 2016

ADAMS, FERRONE AND FERRONE APC

By: /Samantha M. Swanson/  
Samantha M. Swanson  
Attorneys for Plaintiff

JONATHAN RUSKELL

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~~PROPOSED~~ ORDER

The Court having reviewed the Parties' Joint Stipulation and [Proposed] Order regarding proposed discovery and pre-trial cut-off dates, ORDERS that the following discovery and pre-trial cut-off dates be established:

| Matter  | Proposed Date           |
|---|-------------------------|
| Last Day to Amend Pleadings or Add New Parties                      | 2/29/2016               |
| Fact Discovery Cut-Off  | 2/10/2017               |
| Expert Disclosure (Initial)   | 6/9/2017                |
| Expert Disclosure (Rebuttal)  | 7/14/2017               |
| Expert Disclosure (Sur Rebuttal)                                    | 7/28/2017               |
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| Hearing Date for Motions for Summary Judgment*                      | 10/19/2017 at 9:00 A.M. |
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| Final Pretrial Conference*  | 1/11/2018 at 1:30 P.M.  |
| Trial – (5 days)*   | 2/5/2018 at 9:00 A.M.   |

\*These dates have been set pursuant to the Court's Case Management Order entered 1/21/2016.

IT IS SO ORDERED.

Dated: \_\_\_\_\_, 2016



Hon. Beth Labson Freeman  
United States District Judge