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Forensic Medical Group dba Wellpath, Inc.)

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

SACRAMENTO DIVISION

ESTATE OF SALVADOR ROMERO and EMILIA ABEYTA,

Plaintiffs,

vs.

COUNTY OF SOLANO, SOLANO COUNTY SHERIFF'S OFFICE, THOMAS FERRARA, HUNT, KIMBROUGH, CALIFORNIA FORENSIC MEDICAL GROUP dba WELLPATH, INC., and DOE 1 to 20,

Defendants.

Case No. 2:23-cv-00523-JAM-AC

JOINT STIPULATION RE: INITIAL DISCOVERY, FIRST AMENDED COMPLAINT, AND RESPONSIVE PLEADINGS; ORDER

AUTHENTICATED U.S. GOVERNMENT INFORMATION GPO

STIPULATION

The Parties—Plaintiffs Estate of Salvador Romero ("Estate") and Emilia Abeyta (collectively, "Plaintiffs"); Defendant California Forensic Medical Group, Inc. ("CFMG"); and Defendants County of Solano, Solano County Sheriff's Office, Thomas Ferrara, Hunt, and Kimbrough (collectively, "County Defendants")—all through their undersigned counsel of record, and subject to the approval of the Court, have diligently and in good faith met and conferred and stipulate as follows:

WHEREAS, Plaintiffs intend to amend their complaint upon receipt and review of initial discovery;

WHEREAS, under Federal Rule of Civil Procedure 26(1)(A), the Parties must produce initial disclosures;

WHEREAS, the Estate propounded requests for production, set one, on County Defendants and CFMG, with current due dates of July 3, 2023;

WHEREFORE, the Parties have met-and-conferred in good faith and reached an agreement as to the sequence of production of initial discovery, the filing of the First Amendment Complaint, and the filing of responsive pleadings, in manner that is efficient and accommodates the Parties' availability;

Now, THEREFORE, the Parties STIPULATE that:

1. The Parties shall produce initial disclosures under Federal Rule of Civil Procedure 26(1)(A), including copies of the documents identified therein, on or before August 11, 2023;

2. County Defendants and CFMG shall produce responses to the Estate's requests for production, set one, on or before August 11, 2023;

3. Plaintiff shall file a First Amended Complaint, pursuant to Federal Rule of Civil Procedure 15(a)(2), on or before September 8, 2023;

4. County Defendants and CFMG shall file their respective responsive pleadings within 30 days of the filing and service of the First Amended Complaint; and

5. The Parties shall file an Updated Joint Status Report within 30 days of the filing of the First Amended Complaint, pursuant to the Court's Minute Order, ECF No. 9.

IT IS SO STIPULATED.

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Dated: June 9, 2023

Respectfully Submitted,
LAW OFFICE OF MARK E. MERIN

/s/ Mark E. Merin

By: _____
Mark E. Merin
Paul H. Masuhara

Attorneys for Plaintiffs
ESTATE OF SALVADOR ROMERO
and EMILIA ABEYTA

Dated: June 9, 2023

Respectfully Submitted,
Hawkins Parnell & Young, LLP

/s/ Danielle K. Lewis
(as authorized on June 9, 2023)

By: _____
Danielle K. Lewis

Attorneys for Defendants
COUNTY OF SOLANO, SOLANO COUNTY
SHERIFF'S OFFICE, THOMAS FERRARA,
HUNT, and KIMBROUGH

Dated: June 9, 2023

Respectfully Submitted,
MEDICAL DEFENSE LAW GROUP

/s/ Gregory T. Fayard
(as authorized on June 9, 2023)

By: _____
Gregory T. Fayard

Attorneys for Defendant
CALIFORNIA FORENSIC MEDICAL
GROUP, INC. (erroneously sued as California
Forensic Medical Group dba Wellpath, Inc.)

ORDER

GOOD CAUSE APPEARING, the Parties' Stipulation is **GRANTED**.

1. The Parties shall produce initial disclosures under Federal Rule of Civil Procedure 26(1)(A), including copies of the documents identified therein, on or before **August 11, 2023**;

2. County Defendants and CFMG shall produce responses to the Estate's requests for production, set one, on or before **August 11, 2023**;

3. Plaintiff shall file a First Amended Complaint, pursuant to Federal Rule of Civil Procedure 15(a)(2), on or before **September 8, 2023**;

4. County Defendants and CFMG shall file their respective responsive pleadings within **30 days** of the filing and service of the First Amended Complaint; and

5. The Parties shall file an Updated Joint Status Report within **30 days** of the filing of the First Amended Complaint, pursuant to the Court's Minute Order, ECF No. 9.

IT IS SO ORDERED.

Dated: June 12, 2023

/s/ John A. Mendez
THE HONORABLE JOHN A. MENDEZ
SENIOR UNITED STATES DISTRICT JUDGE