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UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF CALIFORNIA

CIRILO HERNANDEZ, an individual; Plaintiff, v. COUNTY OF SACRAMENTO, a municipal corporation; and DOES 1-50, inclusive. Defendants.	Case: 2:25-cv-02276-DJC-CSK **SECOND AMENDED STIPULATION AND ORDER TO AMEND SCHEDULING ORDER**

IT IS HEREBY STIPULATED, and respectfully requested, by and between Plaintiff and Defendants (hereinafter, "the Parties") by and through their designated counsel, that:

WHEREAS, on **April 14, 2026,** this Court issued an amended scheduling order. (**ECF NO. 22).**

WHEREAS, the Parties have engaged in substantive written discovery and are in the process of scheduling nine depositions over the coming months.

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WHEREAS, on July 20, 2026, this Court granted Plaintiff's Motion to Amend the Complaint. (ECF No. 25). On July 24, 2026, Plaintiff filed the First Amended Complaint naming six individual defendants previously identified as Doe Defendants. (ECF No. 27).

WHEREAS, Plaintiff now seeks to file a Second Amended Complaint to include and name one other individual County Defendant, learned recently in discovery.

WHERAS, the Parties have met and conferred and agree to the filing of the Second Amended Complaint. The Parties will submit a separate stipulation and proposed order to explain the good cause for filing this proposed Second Amended Complaint and will include the redlined proposed Second Amended Complaint as an exhibit to the stipulation.

WHEREAS, Defendant County's Counsel has previously indicated that they believe they can accept service on the individual Defendants' behalf. At present, Defense Counsel is actively working to obtain consent to accept service of the anticipated Second Amended Complaint from all individually named Defendants, but at this time, is still working to obtain consent to accept service of the anticipated Second Amended Complaint from Defendant Ma. As to all other named individual Defendants expected to be named in the Second Amended Complaint, Defendant agrees to accept service on their behalf, and will accept service as to Defendant Ma as soon as consent is obtained.

WHEREAS, the Parties contend good cause exists to amend the Court's scheduling order as the Parties are in the midst of scheduling numerous depositions, and seven new defendants have just been included in the case.

WHEREAS, the Parties contend good cause exists to amend the complaint and that the Second Amended Complaint be the operative complaint.

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WHEREAS, the Parties STIPULATE TO and JOINTLY REQUEST that this Court's amended scheduling order (**ECF NO. 13)** be amended accordingly:

Close of Fact Discovery:	~~**September 25, 2026**~~	**January 4, 2027**
Expert Witness Disclosure:	~~**October 23, 2026**~~	**February 3, 2027**
Rebuttal Expert Disclosure:	~~**November 20, 2026**~~	**March 5, 2027**
Close of Expert Discovery:	~~**December 18, 2026**~~	**April 4, 2027**
Dispositive Motion Filing:	~~**February 26, 2027**~~	**May 4, 2027**
Final Pretrial Conference:	**August 5, 2027**	**UNCHANGED**
Proposed Jury Trial:	**October 4, 2027**	**UNCHANGED**

IT IS SO AGREED.

Dated: **August 19, 2026**

/s/ **Ty Clarke**
Ty Clarke
Attorney for Plaintiffs

Dated: **August 19, 2026**

/s/ **Ashley Marie Calvillo**
Ashley Marie Calvillo
Attorney for Defendants

IT IS SO ORDERED.

Dated: August 21, 2026

/s/ Daniel J. Calabretta
THE HONORABLE DANIEL J. CALABRETTA
UNITED STATES DISTRICT JUDGE

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