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Attorneys for Defendants
County of Lake, Sheriff Brian Martin, Captain Greg Hosman,
Sergeant Renee Leffler, Officer James Rhine, Officer Douglas
Aleman, Officer Jared McColough, Officer Joshua Phillipi,
Deputy Kalen Brockwalder, Deputy Michael Davis

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

DANE SHIKMAN,

Case No. 1:16-cv-05121-NJV

Plaintiff,

V.

COUNTY OF LAKE; COUNTY OF LAKE SHERIFF BRIAN MARTIN; CAPTAIN GREG HOSMAN; SERGEANT RENEE LEFFLER; OFFICER JAMES RHINE; OFFICER DOUGLAS ALEMAN; OFFICER KATHERINE PRINCE; OFFICER JARED MCCOLOUGH; OFFICER JOSHUA PHILLIPI; DEPUTY KALEN BROCK WALDER; DEPUTY MICHAEL DA VIS; CALIFORNIA FORENSIC MEDICAL GROUP; TAYLOR FITHIAN, M.D.; ROBBIN BRIGGS; MONIQUE QUILLEN; MANDY ROBBINS; ALISHA STOTTSBERRY; and DOES 1-50;.

Defendants.

**STIPULATION AND [PROPOSED] ORDER TO
CONTINUE FACT DISCOVERY CUTOFF AND
OTHER DEADLINES**

MAGISTRATE JUDGE NANDOR J. VADAS

STIPULATION

Plaintiff DANE SHIKMAN and defendants COUNTY OF LAKE, COUNTY OF LAKE SHERIFF BRIAN MARTIN, CAPTAIN GREG HOSMAN, SERGEANT RENEE LEFFLER, OFFICER JAMES RHINE, OFFICER DOUGLAS ALEMAN, OFFICER JARED MCCOLLOUGH, OFFICER JOSHUA PHILLIPI, DEPUTY KALEN BROCKWALDER, DEPUTY MICHAEL DAVIS (“Lake County Defendants”), OFFICER KATHERINE PRINCE (“Defendant Prince”), CALIFORNIA FORENSIC MEDICAL GROUP, TAYLOR FITHIAN, M.D., ROBBIN BRIGGS, MONIQUE QUILEN, MANDY ROBBINS, and ALISHA STOTTSBERRY (“CFMG Defendants”, by and through their respective attorneys of record, hereby stipulate as follows:

1. At the Case Management Conference on December 6, 2016, this Court assigned a Fact Discovery cutoff date of September 29, 2017 and other deadlines.

2. All parties require additional time to complete discovery. Trial is set for June 4, 2018.

3. Plaintiff DANE SHIKMAN intends to conduct the following further discovery: (1) complete the deposition of defendant ALISHA STOTTSBERRY, (2) depose SHERIFF BRIAN MARTIN, (3) depose CAPTAIN GREG HOSMAN, (4) possibly depose other defense and/or other third party witnesses as indicated through further discovery.

4. The Lake County Defendants and Defendant Prince intends to conduct the following further discovery: (1) depose Plaintiff's father, (2) depose Plaintiff's uncle, (3) depose Joseph Antaree, (4) depose Catherine Clark, (5) depose Vince Belfiore, (6) depose Emily Spura, (7) depose the treating physician from Sutter Hospital, (8) review subpoenaed mental health records once they are received and possibly depose treating physicians and providers.

5. The CFMG Defendants intends to conduct the following further discovery: (1) upon receipt of the mental health records of decedent Gaunt, depositions of the primary treating medical/mental health providers will be scheduled.

6. The parties therefore respectfully request that the Court extend the following deadlines to the new proposed dates:

Fact discovery cutoff: Nov. 17, 2017

Expert disclosures: Dec. 18, 2017

Rebuttal experts: Jan. 12, 2018

Expert discovery cutoff: Feb. 16, 2018

Dispositive motions due: Feb. 28, 2018

Dispositive motions oppositions due: March 26, 2018

Dispositive motions replies due: Apr. 9, 2018

Dispositive motions Hearing: Apr. 20, 2018

Trial: remains the same - June 4, 2018

7. Good cause exist for this extension of these deadlines because of scheduling difficulties with four different law firms and the high number of deponents and their schedules. Furthermore, the Order for mental health providers to produce decedent Ms. Elizabeth Gaunt's mental health records was signed and filed on July 28, 2017 and the parties have not yet received the records. The parties will need additional time to review the records and possibly depose additional mental health providers.

8. The parties respectfully request that the Court approve this stipulation and incorporate its terms in an Order.

IT IS SO STIPULATED.

Dated: August 16, 2017

ABBEY, WEIZENBERG, WARREN & EMERY

By: /s/ Michael D. Green
Michael D. Green
Matthew R. Lilligren
Attorneys for Plaintiff
DANE SHIKMAN

Dated: August 16, 2017

SPINELLI, DONALD & NOTT

By: /s/ Domenic Spinelli
Domenic Spinelli
Attorneys for Defendant
OFFICER KATHERINE PRINCE

1 Dated: August 16, 2017

BERTRAND, FOX, ELLIOT, OSMAN & WENZEL

2 By: /s/ Joanne Tran

3 Gregory M. Fox

4 Joanne Tran

5 Attorneys for Defendants

6 COUNTY OF LAKE, SHERIFF BRIAN

7 MARTIN, CAPTAIN GREG HOSMAN,

8 SERGEANT RENEE LEFFLER, OFFICER

JAMES RHINE, OFFICER DOUGLAS

ALEMAN, OFFICER JARED MCCOLLOUGH,

OFFICER JOSHUA PHILLipi, DEPUTY

KALEN BROCKWALDER, DEPUTY

9 MICHAEL DAVIS

10 Dated: August 16, 2017

LAW OFFICES OF JEROME M. VARANINI

11 By: /s/Jerome M. Varanini

12 Jerome M. Varanini

13 Attorneys for Defendants

14 CALIFORNIA FORENSIC MEDICAL GROUP,

15 TAYLOR FITHIAN, M.D., ROBBIN BRIGGS,

16 MONIQUE QUILLEN, MANDY ROBBINS,

17 ALISHA STOTTSBERRY

17 **ATTORNEY ATTESTATION**

18 I, Joanne Tran, am the ECF user whose identification and password are being used to file the
19 foregoing documents. Pursuant to Civil Local Rule 5.1(i), I hereby attest that the concurrence in the filing
20 of these documents have been obtained from each of its Signatories.

21 Dated: August 16, 2017

22 By: /s/ Joanne Tran

23 Joanne Tran

24 **ORDER**

25 GOOD CAUSE APPEARING THEREFORE, and the parties' having stipulated to the same, the
26 parties' stipulation is hereby APPROVED. The new deadlines are as follows:

27 Fact discovery cutoff: Nov. 17, 2017

Expert disclosures: Dec. 18, 2017

Rebuttal experts: Jan. 12, 2018

Expert discovery cutoff: Feb. 16, 2018

Dispositive motions due: Feb. 28, 2018

Dispositive motion oppositions due: March 26, 2018

Dispositive motion replies due: Apr. 9, 2018

Dispositive motions Hearing: Apr. 20, 2018

Trial: remains the same - June 4, 2018

IT IS SO ORDERED.

DATED: 8/21/2017

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MAGISTRATE JUDGE NANDOR J. VADAS
United States Magistrate Judge