

1 COSCA LAW CORPORATION  
2 CHRIS COSCA SBN 144546  
3 1007 7<sup>th</sup> Street, Suite 210  
4 Sacramento, CA 95814  
5 916-440-1010

6 AMY L. BELLANTONI  
7 THE BELLANTONI LAW FIRM, PLLC  
8 2 Overhill Road, Suite 400  
9 Scarsdale, NY 10583  
10 Telephone: 914-367-0090  
11 Facsimile: 888-763-9761  
12 *Pro Hac Vice*

13 Attorneys for Plaintiffs

14 **UNITED STATES DISTRICT COURT**  
15 **EASTERN DISTRICT OF CALIFORNIA**

16 MARK BAIRD and  
17 RICHARD GALLARDO,

18 Plaintiffs,

19 v.

20 ROB BONTA, in his official capacity as  
21 Attorney General of the State of California,  
22 and DOES 1-10,

23 Defendants.

Case No. 2:19-CV-00617

**STIPULATION TO EXTEND TIME FOR  
EXPERT DISCOVERY**

Courtroom: 3

Judge: Hon. Kimberly J. Mueller

Action Filed: April 10, 2019

24 In accordance with Eastern District of California Local Rule 143, Plaintiffs Mark Baird and  
25 Richard Gallardo and Defendant Attorney General Rob Bonta hereby stipulate to, and seek a Court  
26 order granting, an extension of time for the completion of expert discovery from October 29, 2021,  
27 to November 30, 2021. There is good cause to extend these deadlines. Plaintiffs' counsel was  
28 unable to attend the last of the expert depositions to be held in this action, which was scheduled for  
October 28, 2021. In light of counsel's unavailability, the parties have agreed to reschedule the

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

deposition of Kim Raney from October 28, 2021 to November 17, 2021.

IT IS SO STIPULATED.

Dated: October 28, 2021

/s/ Amy L. Bellantoni  
AMY L. BELLANTONI  
The Bellantoni Law Firm, PLLC  
*Attorney for Plaintiffs*  
*Pro Hac Vice*

Dated: October 28, 2021

/s/ R. Matthew Wise  
R. MATTHEW WISE  
Deputy Attorney General  
*Attorney for Defendant Attorney General*  
*Rob Bonta*

**[PROPOSED] ORDER**

GOOD CAUSE APPEARING, THE COURT HEREBY ORDERS that the October 29, 2021 expert discovery deadline is extended to November 30, 2021.

IT IS SO ORDERED.

Dated: October \_\_\_\_, 2021

HON. KIMBERLY J. MUELLER  
United States District Judge