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**UNITED STATES DISTRICT COURT**

**CENTRAL DISTRICT OF CALIFORNIA**

ANA PATRICIA FERNANDEZ, an  
individual,

Plaintiff,

v.

LOS ANGELES COUNTY, et al.,

Defendants.

Case No.: 2:20-cv-09876 DMG (PDx)

**JOINT STIPULATION TO  
CONTINUE EXPERT DISCOVERY  
DEADLINES; [PROPOSED] ORDER**

Pursuant to Rule 16(b)(4) of the Federal Rules of Civil Procedure and Local Rule 7-1, Plaintiff Ana Patricia Fernandez and Defendants Los Angeles County, Wyatt Waldron, and John Roth (“Defendants”), through their counsel of record, jointly request that this Court extend all expert discovery deadlines by three weeks in accordance with the schedule set forth herein. Counsel has conferred via telephone regarding the need for this

1 extension and does not believe that the requested extension will impact trial deadlines.  
2 Stipulating parties, by and through their counsel, hereby stipulate and jointly move the  
3 following:

4 WHEREAS, on March 7, 2023, the Court issued a Scheduling and Case  
5 Management Order re Jury Trial (Dkt. 64);

6 WHEREAS, the initial expert disclosure and report deadline was set for August 9,  
7 2023, the rebuttal expert disclosure and report deadline was set for September 8, 2023,  
8 and the expert discovery deadline was set for October 6, 2023;

9 WHEREAS, Plaintiff has been delayed in producing the expert discovery required  
10 due to several factors;

11 WHEREAS, Plaintiff's experts operate an auction house and received a large  
12 collection of firearms which they must process and prepare for auction; this preparation,  
13 together with the preparation of Plaintiff's extensive expert report, has placed a significant  
14 burden on Plaintiff's expert, who will not have time to accomplish both by the August 9,  
15 2018, deadline for initial reports;

16 WHEREAS, preparation of Plaintiff's expert report, along with the necessary  
17 appendices, has proven to be substantially more work than anticipated for Plaintiff's  
18 expert because there are more than 450 firearms to appraise, and the report must include  
19 serial numbers, makes, models, calibers, barrel lengths, descriptions/conditions, fair  
20 market values, auction prices, and other matters to include in the report. This task alone is  
21 taking up a great deal of time and effort to make sure that each entry is correct;

22 WHEREAS counsel for both parties have been diligently working on propounding  
23 and responding to written discovery requests in an effort to meet the schedule set by the  
24 Court;

25 WHEREAS, Plaintiff's counsel had a deadline of August 8, 2023, to respond to  
26 Defendant Los Angeles County's Requests for Production of Documents, Set 1,  
27 Defendant John Roth's Requests for Production of Documents, Set 1, and Defendant  
28 Wyatt Waldron's Requests for Production of Documents, Set 1, as well as Defendant Los

1 Angeles County's Interrogatories, Set 1, Defendant John Roth's Interrogatories, Set 1, and  
2 Defendant Wyatt Waldron's Interrogatories, Set 1;

3 WHEREAS, Defendants' counsel has a deadline of August 28, 2023, extended from  
4 August 11, 2023, by mutual agreement, to respond to Plaintiff Ana Patricia Fernandez's  
5 Requests for Production of Documents to Defendant Los Angeles County, Set 1, Plaintiff  
6 Ana Patricia Fernandez's Requests for Production of Documents to Defendant John Roth,  
7 Set 1, and Plaintiff Ana Patricia Fernandez's Requests for Production of Documents to  
8 Defendant Wyatt Waldron, Set 1, as well as Plaintiff Ana Patricia Fernandez's  
9 Interrogatories to Defendant Los Angeles County, Set 1, Plaintiff Ana Patricia  
10 Fernandez's Interrogatories to Defendant John Roth, Set 1, and Plaintiff Ana Patricia  
11 Fernandez's Interrogatories to Defendant Wyatt Waldron, Set 1;

12 WHEREAS, Plaintiff's counsel also has encountered difficulties with scheduling  
13 because several cases have deadlines that were not in place when this schedule was set,  
14 including an opening brief in *B&L Productions v. Newsom*, Ninth Circuit Case No. 23-  
15 55431, and an amicus brief due in *Koons v. Platkin*, Third Circuit Consolidated Case Nos.  
16 23-1900 & 2043;

17 WHEREAS, Defendants' counsel begins a two-day jury trial on August 15, 2023, in  
18 *Michael Angelo Serrato vs. County of Los Angeles, et. al.*, Case No. 2:13-cv-00449-AB;

19 WHEREAS, the parties believe that a three-week extension of the timeline for  
20 expert discovery, including the exchange of initial reports, rebuttal reports, and the close  
21 of expert discovery, is necessary and desirable to ensure adequate time to conduct the  
22 discovery and provide the Court and the parties with accurate and helpful expert reports;

23 WHEREAS, trial is currently set to begin on March 26, 2024, so all expert  
24 discovery will still be concluded well in advance of trial;

25 WHEREAS, this request is made for good cause and not simply to delay;

26 WHEREAS, for these reasons, good cause exists to extend the expert discovery  
27 production dates and the dates that follow this discovery schedule by three weeks.

28 NOW, THEREFORE, IT IS STIPULATED AND REQUESTED that the deadlines

be continued for three weeks as follows:

1. The initial expert disclosure and report deadline currently set for August 9, 2023, shall be continued to August 30, 2023;
2. The rebuttal expert disclosure and report deadline currently set for September 8, 2023, shall be continued to September 29, 2023;
3. The expert discovery deadline currently set for October 6, 2023, shall be continued to October 27, 2023;
4. All other dates and deadlines set by the Scheduling and Case Management Order re Jury Trial (Dkt. 64) shall remain the same.

IT IS SO STIPULATED AND AGREED.

Dated: August 9, 2023

**MICHEL & ASSOCIATES, P.C.**

s/ Anna M. Barvir

Anna M. Barvir  
Counsel for Plaintiff Ana Patricia  
Fernandez

Dated: August 9, 2023

**LOGAN MATHEVOSIAN & HUR,  
LLP**

s/ Amber A. Logan

Amber A. Logan  
Counsel for Defendants County of  
Los Angeles, John Roth, and Wyatt  
Waldron

### ATTESTATION OF E-FILED SIGNATURES

I, Anna M. Barvir, am the ECF User whose ID and password are being used to file this JOINT STIPULATION TO CONTINUE EXPERT DISCOVERY DEADLINES; [PROPOSED] ORDER. In compliance with Central District of California L.R. 5-4.3.4, I attest that all signatories are registered CM/ECF filers and have concurred in this filing.

Dated: August 9, 2023

s/ Anna M. Barvir

Anna M. Barvir

**CERTIFICATE OF SERVICE**  
**IN THE UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**

Case Name: *Fernandez, v. Los Angeles County, et al.*  
Case No.: 2:20-cv-09876 DMG (PDx)

IT IS HEREBY CERTIFIED THAT:

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 180 East Ocean Boulevard, Suite 200, Long Beach, California 90802.

I am not a party to the above-entitled action. I have caused service of:

**JOINT STIPULATION TO CONTINUE EXPERT DISCOVERY DEADLINES;  
[PROPOSED] ORDER**

on the following party by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which electronically notifies them.

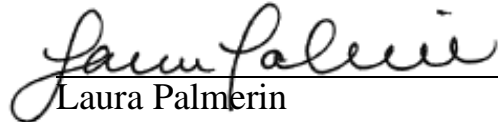
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*Attorneys for Defendants Los Angeles County,  
Wyatt Waldron, and John Roth*

I declare under penalty of perjury that the foregoing is true and correct.

Executed August 9, 2023.

  
\_\_\_\_\_  
Laura Palmerin