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IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF IDAHO

ADREE EDMO,)	Case No. 1:17-cv-151-BLW
)	
Plaintiffs,)	STIPULATED DISCOVERY AND
vs.)	BRIEFING SCHEDULE
)	
IDAHO DEPARTMENT OF)	
CORRECTION; HENRY ATENCIO, in)	
his official capacity; JEFF ZMUDA, in)	
his official capacity; HOWARD KEITH)	
YORDY, in his official and individual)	
capacities; CORIZON, INC.; SCOTT)	
ELIASON; MURRAY YOUNG;)	
RICHARD CRAIG; RONA SIEGERT;)	
CATHERINE WHINNERY; AND)	
DOES 1-15;)	
)	
Defendants.)	
_____)	

COME NOW the Plaintiff and Defendants, by and through their respective attorneys of record, and pursuant to this Court’s June 12, 2018 order directing counsel to meet and confer regarding a discovery and briefing schedule, do hereby submit this stipulation setting forth the agreed-upon discovery and briefing deadlines in advance of the evidentiary hearing scheduled for October 10, 11, and 12, 2018.

1. The parties shall exchange Initial Disclosures consistent with the requirements of Rule 26(a)(1) of the Federal Rules of Civil Procedure (“FRCP”) on or before June 29, 2018.

2. The Plaintiff shall disclose all expert testimony consistent with FRCP 26(a)(2)(A)-(C) on or before July 13, 2018.

3. The Defendants shall disclose all expert testimony consistent with FRCP 26(a)(2)(A)-(C) on or before August 31, 2018.

4. The parties shall disclose to each other the identities of each witness, including lay and expert witnesses, that the party intends to call at the evidentiary hearing on or before August 31, 2018. In lieu of and/or in addition to live testimony at the evidentiary hearing, the parties may submit by this date written testimony of any witness by sworn declaration.

5. All factual discovery shall be completed by August 31, 2018. All written discovery requests must be made far enough in advance to allow completion of the discovery with the applicable federal rules prior to this discovery cut-off date. Expert depositions must be completed by September 28, 2018.

- a. Each side shall have the right to take ten fact depositions inclusive of parties. Each deposition shall last no longer than seven hours on the record. Pursuant to Local Rule 30.1, the parties' agreement or authorization by the Court is required if either the Plaintiff or the Defendants wish to take more than ten depositions or to spend more than seven hours conducting any deposition.
- b. Each side (i.e., Plaintiff and Defendants) shall have the right to take the deposition of the other parties' disclosed expert witnesses. Each deposition shall last no longer than seven hours on the record.
- c. In accordance with FRCP 45, the parties shall have the right to issue and serve subpoenas to third-parties.

6. If the Defendants wish to file a brief with the Court in response to Plaintiff's Motion for Preliminary Injunction, then Defendants shall file their response(s) on or before September 14, 2018.

7. If the Plaintiff elects to file a reply brief, the reply shall be filed on or before September 28, 2018.

8. The deadlines contained in this stipulation may be modified with the consent of the parties or by Court order upon a finding of good cause.

DATED this 15th day of June, 2018.

/s/ Lori Rifkin
Lori Rifkin
Attorney for Plaintiff

DATED this 15th day of June, 2018.

/s/ Dylan Eaton
Dylan Eaton
Attorney for Corizon Defendants

DATED this 15th day of June, 2018.

/s/ Marisa S. Crecelius
Marisa S. Crecelius
Attorney for IDOC Defendants

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 15th day of June, 2018, I filed the foregoing electronically through the CM/ECF system, which caused the following parties or counsel to be served by electronic means, as more fully reflected on the Notice of Electronic Filing:

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