

1 **BRETT L. DICKERSON, SBN 184884**  
2 **GIANELLI & ASSOCIATES**  
3 A Professional Law Corporation  
4 1014 - 16th Street  
5 P. O. Box 3212  
6 Modesto, CA 95353  
7 (209) 521-6260

8 Attorneys for Plaintiff

9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA  
FRESNO DIVISION

KAREN SCHELLER,

Plaintiff,

vs.

AMERICAN MEDICAL RESPONSE, INC., a  
foreign corporation, CINDY WOOLSTON, an  
individual and DOES 1-25, inclusive,

Defendants.

Case No. 1:08-CV-00798-OWW-DLB

**STIPULATION AND ORDER FOR  
CONTINUANCE OF TRIAL DATE AND  
CORRESPONDING DEADLINES FOR  
MOTIONS IN LIMINE, TRIAL BRIEFS  
AND OTHER RELATED PRE-TRIAL  
ACTIVITIES.**

On February 8, 2011 at 3:00 p.m., a Pre-Trial Conference was held in the above captioned matter. A new trial date of March 29, 2011 was set with corresponding motion, briefing and other deadlines established based upon the March 29 trial date. However, because of the potential for scheduling conflicts, a back-up trial date of July 12, 2011 was also reserved on the Court's calendar.

On February 9, 2011, at approximately 8:30 a.m., counsel for plaintiff Karen Scheller learned that both of the expert witnesses retained by plaintiff in this matter were unavailable for the March 29 trial date. Because of their unavailability, the Parties, by and through their counsel, hereby stipulate and agree to having the trial date continued to July 12, 2011, the back-up date established during the Pre-Trial Conference. Additionally, the Parties further agree that 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

**ORDER**

Based upon the stipulation of the Parties it is hereby ORDERED that the scheduled dates are continued as follows:

<u>Event</u>	<u>Present Schedule</u>	<u>Continued Schedule</u>
Exhibit Marking Conference Deadline	March 1, 2011	June 14, 2011
Motions in Limine Due	March 1, 2011	June 14, 2011
Oppositions to Motions in Limine Due	March 15, 2011	June 28, 2011
Hearing date for Motions in Limine	March 18, 2011	July 1, 2011
Trial Briefs Due	March 24, 2011	July 7, 2011
Jury Instructions and Verdict Form Due	March 28, 2011	July 11, 2011
Jury Trial	March 29, 2011	July 12, 2011

IT IS SO ORDERED.

Dated: **February 17, 2011**

**/s/ Oliver W. Wanger**  
UNITED STATES DISTRICT JUDGE