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Attorneys for Plaintiff
CONNIE ARNOLD

11 **Attorney for Defendant**
LIBERTY HOTEL INV., L.P.

12 UNITED STATES DISTRICT COURT
 13 EASTERN DISTRICT OF CALIFORNIA

15 CONNIE ARNOLD,

16 Plaintiff,

17 v.

18 IC KANG CORPORATION, d.b.a. LA QUINTA
 INN & SUITES – VISALIA; OMKAR INNS,
 19 INC.; and DOES 1 through 35, inclusive,

20 Defendants.

Case No. 1:08-CV-01246-AWI-DLB

**STIPULATION AND ORDER
 RE EXTENSION OF DEADLINES
 SET FORTH IN SCHEDULING
 ORDER**

Complaint Filed: August 22, 2008
 Trial Date: February 23, 2010

22 **TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS:**

23 Plaintiff CONNIE ARNOLD and Defendants IC KANG CORPORATION and
 24 LIBERTY HOTEL INVESTMENT, L.P., by and through their respective attorneys of record,
 25 hereby stipulate and agree to extend several deadlines originally set in the Scheduling Order as
 26 described below.

27 The parties stipulate that good cause exists to extend the various pre-trial deadlines
 28 based upon the following considerations:

1 1. Plaintiff and Defendants are currently engaging in good faith discussions to
2 settle this matter and wish to avoid further litigation costs to all parties involved, in the hopes that
3 this matter will soon be settled.

4 2. There is currently a Settlement Conference set for September 1, 2009.

5 3. Plaintiff and Defendants have looming deadlines which require extensive
6 filings either before or just after the Settlement Conference takes place. If the deadlines set forth
7 in the Scheduling Order are not extended, all parties will be required to incur substantial fees and
8 costs that may prove unnecessary. Therefore, the parties request additional time to avoid waste of
9 judicial and/or party resources.

10 4. The extension of the various pre-trial deadlines will in no way affect the
11 trial date of February 23, 2010.

12 IT IS HEREBY STIPULATED AND AGREED by and between Plaintiff
13 CONNIE ARNOLD and Defendants IC KANG CORPORATION and LIBERTY HOTEL
14 INVESTMENT, L.P., through their respective attorneys of record:

15 1. To extend the deadline for parties to complete all discovery pertaining
16 experts from October 1, 2009 to October 16, 2009;

17 2. To extend the deadline for parties to disclose all expert witnesses, in
18 writing, from August 3, 2009 to September 14, 2009;

19 3. To extend the deadline for parties to disclose all supplemental experts,
20 from September 1, 2009 to September 28, 2009;

21 4. To extend the deadline for the filing of all Non-Dispositive Pre-Trial
22 Motions, including any discovery motions, from September 16, 2009 to September 30, 2009;

23 5. To extend the deadline for the hearing of all Non-Dispositive Pre-Trial
24 Motions, including any discovery motions, from October 9, 2009 to October 23, 2009;

25 6. To extend the deadline for the filing of all Dispositive Pre-Trial Motions,
26 including any discovery motions, from September 25, 2009 to October 23, 2009; and

27 7. To extend the deadline for the hearing of all Dispositive Pre-Trial Motions,
28 including any discovery motions, from October 26, 2009 to November 23, 2009.

1 These extensions are agreed to between counsel for the parties with a good faith
2 desire to continue in settlement discussions without the real possibility that the looming deadlines
3 may cause the parties to incur such additional expense that settlement discussions may be
4 hampered. Accordingly, all counsel respectfully request that the Court grant an order pursuant to
5 the terms stipulated here.

6 **IT IS SO STIPULATED.**

7 Date: 7/15/09, 2009

GOODMAN & METZ

8
9 By: /S/MARGARET BYRNE IKEDA
10 JORDON METZ
MARGARET BYRNE IKEDA

11 Attorney for Plaintiff
12 CONNIE ARNOLD

13 Date: 7/15/09, 2009

HOPPE LAW GROUP

14
15 By: /S/THEODORE W. HOPPE
THEODORE W. HOPPE

16 Attorney for Defendant
17 LIBERTY HOTEL INV., L.P.

18 Date: July 15, 2009

BASHAM PARKER LLP

19
20
21 By: /S/GARY BASHAM
GARY BASHAM

22 Attorney for Defendant
23 IC KANG CORPORATION

24 **IT IS SO ORDERED:**

25
26 Dated: 21 July 2009

/s/ Dennis L. Beck

27 **UNITED STATES MAGISTRATE JUDGE**