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(Appearances continued on following page)

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

CONNIE ARNOLD,

Plaintiff,

v.

IC KANG CORPORATION, d.b.a LA
QUINTA INN & SUITES-VISALIA;
OMKAR INNS, INC.,; And DOES 1
through 35, Inclusive,

Defendants.

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

*The Honorable Dennis L. Beck, Magistrate
Judge, presiding*

**JOINT STIPULATION AND ORDER
SETTING PRE-TRIAL DEADLINES
AND TRIAL DATES**

Complaint Filed: August 22, 2008
Trial Date: None set.

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Attorney for Defendant, LIBERTY HOTEL INVESTMENTS, L.P.

TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS:

Pursuant to the Court's Order on June 1, 2010, Plaintiff CONNIE ARNOLD and Defendants IC KANG CORPORATION and LIBERTY HOTEL INVESTMENT, L.P. (collectively the "Parties"), by and through their respective attorneys of record, met and conferred as to proposed trial deadlines, including discovery cut-off and motion cut-off deadlines. As directed by the Court, the Parties have submitted this Joint Stipulation and [Proposed] Order Setting Pre-trial deadlines and trial dates as follows:

Plaintiff and Defendants agree to a trial date of July 19, 2011, with the following limitations and deadlines.

Deadlines: If a trial date is set for **July 19, 2011:**

Deadline to complete non-expert discovery.....December 17, 2010
Deadline to disclose expert witnesses and reports.....January 14, 2011
Disclosure of Rebuttal Expert witnesses and reports.....February 14, 2011
Deadline to complete expert discovery.....March 29, 2011
Deadline for hearing on non-dispositive motions.....April 12, 2011
Deadline for hearing on dispositive motions.....April 26, 2011
Deadline for Pre-Trial conference:.....May 24, 2011
Deadline to disclosure of identities of all witnesses to be called
in each party's case-in-chief.....May 24, 2011

IT IS SO STIPULATED.

Date: August 23, 2010

BARBOSA, METZ, IKEDA & HARRISON, LLP

By: /s/ Margaret Byrne Ikeda
MARGARET BYRNE IKEDA
Attorney for Plaintiff, CONNIE ARNOLD

Date: August 23, 2010

HOPPE LAW GROUP

By: /s/ Brian O'Driscoll
BRIAN O'DRISCOLL
Attorney for Defendant, LIBERTY HOTEL INV., L.P.

Date: August 23, 2010

BASHAM PARKER LLP

By: /s/ Meagan Christiansen
MEAGAN CHRISTIANSEN
Attorney for Defendant, IC KANG CORP.

IT IS SO ORDERED.

With the exception of the following the Court adopts the schedule proposed by the parties.

Pre-Trial Motion Schedule

All Non-Dispositive Pre-Trial Motions, including any discovery motions, shall be filed no later than March 18, 2011 and heard on or before April 15, 2011. Non-dispositive motions are heard on Fridays at 9:00 a.m., before the Honorable Dennis L. Beck, United States Magistrate Judge in Courtroom 9. Counsel must comply with Local Rule 251 with respect to discovery disputes or the motion will be denied without prejudice and dropped from calendar.

In scheduling such motions, the Magistrate Judge may grant applications for an order shortening time pursuant to Local Rule 144(3). However, if counsel does not obtain an order shortening time, the notice of motion *must* comply with Local Rule 251.

Counsel may appear and argue non-dispositive motions by telephone, providing a written request to so appear is made to the Magistrate Judge's Courtroom Clerk no later than five (5) court days before the noticed hearing date. In the event that more than one attorney requests to appear by telephone then it shall be the obligation of the moving part(ies) to arrange and originate a conference call to the court.

All Dispositive Pre-Trial Motions shall be filed no later than March 18, 2011 and heard no later than April 25, 2011, in Courtroom 2 before the Honorable Anthony W. Ishii, United States District Court Judge. In scheduling such motions, counsel shall comply with Fed.R.Civ.P 56 and Local Rules 230 and 260.

Motions for Summary Judgment or Summary Adjudication

Prior to filing a motion for summary judgment or motion for summary adjudication the parties are ORDERED to meet, in person or by telephone, and confer to discuss the issues to be raised in the motion.

The purpose of the meeting shall be to: 1) avoid filing motions for summary judgment where a question of fact exists; 2) determine whether the respondent agrees that the motion has merit in whole or in part; 3) discuss whether issues can be resolved without the necessity of briefing; 4) narrow the issues for review by the court; 5) explore the possibility of settlement before the parties incur the expense of briefing a summary judgment motion; 6) to arrive at a joint statement of undisputed facts.

The moving party shall initiate the meeting and provide a draft of the joint statement of undisputed facts. In addition to the requirements of Local Rule 260 the moving party shall file a joint statement of undisputed facts.

In the notice of motion the moving party shall certify that the parties have met and conferred as ordered above or set forth a statement of good cause for the failure to meet and confer.

Pre-Trial Conference Date

June 10, 2011 at 8:30 a.m. in Courtroom 2 before Judge Ishii.

The parties are ordered to file a **Joint Pretrial Statement pursuant to Local Rule 281(a)(2)**. The parties are further directed to submit a digital copy of their pretrial statement in Word Perfect X4¹ format, directly to Judge Ishii's chambers by email at AWIOrders@caed.uscourts.gov.

Counsels' attention is directed to **Rules 281 and 282 of the Local Rules** of Practice for the Eastern District of California, as to the obligations of counsel in preparing for the pre-trial conference. The Court will insist upon strict compliance with those rules. In addition to the matters set forth in the Local Rules the Joint Pretrial Statement shall include a Joint Statement of the case to be used by the Court to explain the nature of the case to the jury during voir dire.

Trial Date

August 2, 2011 at 8:30 a.m. in Courtroom 2 before the Honorable Anthony W. Ishii, United States District Court Judge.

¹ If WordPerfect X4 is not available to the parties then the latest version of WordPerfect available to the parties or any other word processing program in general use for IBM compatible personal computers is acceptable.

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This is a jury trial.

Estimate of Trial Time: 4 to 5 days.

Counsel's attention is directed to Local Rules of Practice for the Eastern District of California,
Rule 285.

IT IS SO ORDERED.

Dated: September 1, 2010

/s/ Dennis L. Beck
UNITED STATES MAGISTRATE JUDGE