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(Appearances continued on following page)

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

CONNIE ARNOLD

**CASE NO. 1:08-CV-01246-AWI-DLB**

PLAINTIFF

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

v.

**JOINT STIPULATION AND ORDER  
RESETTING DISCOVERY AND  
OTHER DEADLINES**

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

DEFENDANTS.

Complaint Filed: August 22, 2008  
Trial Date: August 2, 2011

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Attorney for Defendant  
LIBERTY HOTEL INVESTMENTS, L.P.

1 **TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:**

2 **IT IS STIPULATED AND AGREED** by and between counsel for Plaintiff  
3 CONNIE ARNOLD and counsel for Defendant IC KANG CORPORATION and LIBERTY  
4 HOTEL INVESTMENTS LLC (hereinafter collectively referred to as “the Parties”) that the  
5 deadlines to complete discovery, motions—both dispositive and non-dispositive, and other pre-  
6 trial matters, should be continued, as further delineated below. This stipulation is made  
7 because the Parties have agreed to submit this matter to mediation with a mutually agreed  
8 upon private mediator on December 10, 2010 in an effort to settle this matter. Pending  
9 completion of the mediation, the Parties wish to extend the below deadlines to avoid incurring  
10 potentially unnecessary discovery and litigation costs. The Parties agree to the following  
11 modified discovery, motion, and other deadlines and limitations:  
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<b>Description of Deadline</b>	<b>Old Deadline</b>	<b>New Deadline</b>
14 Deadline to Complete Non-Expert Discovery	12/17/2010	1/24/2011
15 Deadline to Disclose Expert Witnesses and Reports	1/14/2011	1/31/2011
16 Disclosure of Rebuttal Expert Witnesses and Reports	2/14/2011	No change
17 Deadline to Complete Expert Discovery	3/29/2011	3/16/2011
18 Deadline for Filing Non-Dispositive Pre-Trial Motions	3/18/2011	4/15/2011
19 Deadline for Filing Dispositive Pre-Trial Motions	3/18/2011	4/15/2011
20 Deadline for Hearing on Non-Dispositive Pre-Trial 21 Motions	4/15/2011	5/13/2011
22 Deadline for Hearing on Dispositive Pre-Trial Motions	4/25/2011	6/6/2011
23 Deadline to Disclosure of All Witnesses to Be Called In 24 Each Party’s Case In Chief	5/24/2011	6/10/2011
25 Deadline for Pre-Trial Conference	6/10/2011	8/17/2011
26 Trial Date	8/2/2011	10/4/2011

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**IT IS SO STIPULATED**

Date: November 18, 2010

BARBOSA, METZ, IKEDA & HARRISON, LLP

/s/ Jordon Metz  
JORDON METZ  
Attorneys for Plaintiff, CONNIE ARNOLD

Date: November 19, 2010

BASHAM LAW GROUP

/s/ Gary Basham  
GARY BASHAM  
Attorney for Defendant  
IC KANG CORPORATION

Date: November 19, 2010

HOPPE LAW GROUP

/s/ Theodore W. Hoppe  
THEODORE W. HOPPE  
Attorney for Defendant Liberty Hotel Inv., LP.

**ORDER**

Pursuant to Stipulation, and for good cause shown,

IT IS SO ORDERED.

Dated: November 29, 2010

/s/ Dennis L. Beck  
UNITED STATES MAGISTRATE JUDGE