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 10 a California corporation

11 **UNITED STATES DISTRICT COURT**  
 12 **EASTERN DISTRICT OF CALIFORNIA, FRESNO DIVISION**

13 RASHID MANSOUR, an individual and  
 14 TWO WAY FRUIT STAND, INC., a  
 15 California corporation,

16 Plaintiffs,

17 v.

18 UNITED STATES OF AMERICA, and  
 19 DOES 1 through 20 inclusive,

20 Defendants.

Case No. 1:08-CV-01313 LJO DLB

STIPULATION TO EXTEND NON-  
 EXPERT DISCOVERY CUT-OFF  
 DATE AND ORDER THEREON

**(Rule 29 of the Federal Rules of Civil  
 Procedure)**

21 Plaintiffs Rashid Mansour and Two Way Fruit Stand, Inc., and Defendant,  
 22 United States of America, by and through their attorneys of record hereby stipulate and agree  
 23 as follows:

24 1. To extend the non-expert discovery cut-off date in the above-captioned  
 25 matter from May 1, 2009 to June 19, 2009.

26 The proposed cut-off date for non-expert discovery will enable the parties to  
 27 take the necessary depositions in a timely and efficient manner and complete all necessary  
 28 written discovery.

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1 As demonstrated by the declaration of Melody A. Hawkins, counsel of record  
2 for Plaintiffs, Plaintiffs request this extension in good faith on the grounds that Plaintiffs'  
3 current financial condition has made it difficult for them to afford counsel. (Declaration of  
4 Melody A. Hawkins in Support of Extension of Non-Expert Discovery Completion Date  
5 ["Hawkins Dec.," ¶ 4) (a true copy of which is attached hereto as Exhibit "A" and  
6 incorporated herein by reference.) The additional time that has been requested will allow  
7 Plaintiffs to seek and obtain means necessary to continue and complete their non-expert  
8 discovery. (Hawkins Dec., ¶ 4). This extension will not negatively affect the furtherance of  
9 this action as it will not result in the extension of the trial date or the dates set for the filing of  
10 either non-dispositive or dispositive motions. (Hawkins Dec., ¶ 7).

11 In Fresno, California, this 1<sup>st</sup> day of April 2009.

12  
13 By: /s/ Melody A. Hawkins  
14 Melody A. Hawkins  
15 Attorneys for Plaintiffs,  
16 Rashid Mansour, an individual  
17 and Two Way Fruit Stand, Inc.,  
18 a California corporation

19 By: /s/ Jeffrey J. Lodge  
20 Jeffrey J. Lodge  
21 Attorneys for Defendant  
22 United States of America

23 **ORDER**

24 The court having reviewed the proceeding Stipulation and good cause therefore:  
25 **IT IS HEREBY ORDERED** that the non-expert discovery cut-off date be  
26 extended to June 19, 2009.

27 DATED: 1 April 2009

28 /s/ Dennis L Beck  
Honorable Dennis L. Beck  
United States Magistrate Judge