

1 **APPELL | HILAIRE | BENARDO LLP**
2 **Barry M. Appell, Esq. (CSB #174324)**
3 **15233 Ventura Boulevard, Suite 420**
4 **Sherman Oaks, California 91403**
5 **Telephone: 818-788-2300**
6 **Facsimile: 818-788-2464**
7 **barry@ahblegal.com**

8 Attorneys for Plaintiff
9 TERRY SANDRES

10 **GLEASON & FAVAROTE, LLP**
11 **Paul M. Gleason, Esq. (CSB # 155569)**
12 **Richard Y. Chen, Esq. (CSB # 225392)**
13 **Kathy H. Gao, Esq. (CSB #259392)**
14 **835 Wilshire Blvd., Suite 200**
15 **Los Angeles, CA 90017**
16 **Telephone: 213-452-0510**
17 **Facsimile: 213-452-0514**
18 **pgleason@gleasonfavarote.com**
19 **rchen@gleasonfavarote.com**
20 **kgao@gleasonfavarote.com**

21 Attorneys for Defendants
22 Corrections Corporation of America and
23 CCA of Tennessee, LLC

24 **UNITED STATES DISTRICT COURT**
25 **EASTERN DISTRICT OF CALIFORNIA, FRESNO DIVISION**

26 TERRY SANDRES, an individual,
27
28 Plaintiff,

vs.

CORRECTIONS CORPORATION OF
AMERICA, a Maryland corporation; and Does 1
through 50, inclusive,

Defendants.

CASE NO. 1:09-cv-01609 OWW-JLT

Assigned to: Hon. Oliver W. Wanger/Room
3

**STIPULATION AND ORDER TO
CONTINUE THE DEADLINE FOR
ALL NON-EXPERT DISCOVERY**

District Judge: Oliver W. Wanger
Magistrate Judge: Jennifer L. Thurston
Action filed: July 24, 2009
Trial Date: August 30, 2011

1 THE PARTIES TO THE ABOVE-CAPTIONED MATTER, by and through their
2 respective attorneys of record, hereby enter into this stipulation to continue the deadline for all non-
3 expert discovery, based on the following:

4 WHEREAS, the Court issued a Scheduling Conference Order on February 3, 2010;

5 WHEREAS, on October 1, 2010, the Court issued an Order to Continue the Trial and All
6 Related Dates, which set the deadline to complete all non-expert discovery to February 15, 2011;

7 WHEREAS, the parties have diligently engaged in discovery and commenced the taking of
8 Plaintiff's deposition;

9 WHEREAS, however, primarily due to trial calendars of respective counsel for both
10 parties, the parties have had difficulty in completing the depositions and discovery in this case and
11 the parties do not believe that they can do so by the current February 15, 2011 deadline;

12 WHEREAS, the parties have met and conferred and believe that the deadline for the
13 completion of all non-expert discovery should be continued to March 7, 2011 in order to complete
14 outstanding depositions, and follow up discovery;

15 THEREFORE, THE PARTIES IN THE ABOVE-ENTITLED ACTION HEREBY
16 STIPULATE and agree, and request that this Court make the following orders:

- 17 1. That the Court extends the deadline to complete non-expert discovery from February
18 15, 2011 to March 7, 2011.

19
20
21 Dated: January 3, 2011

APPELL | HILAIRE | BENARDO LLP

22 By _____/s/ BARRY APPELL_____
23 Barry Appell
24 Attorney for Plaintiff

25 Dated: January 3, 2011

GLEASON & FAVAROTE, LLP

26 By _____/s/ RICHARD CHEN_____
27 Richard Chen
28 Attorney for Defendants

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

Pursuant to the parties' stipulation and good cause being shown therefore, the Court hereby makes the following orders:

1. The deadline to complete all non-expert discovery has been continued to March 7, 2011.

IT IS SO ORDERED.

Dated: January 3, 2011

/s/ Oliver W. Wanger
UNITED STATES DISTRICT JUDGE