

1 PATRICIA BARBOSA, Esq. (SBN 125865)  
 JORDON METZ, Esq. (SBN 167355)  
 2 MARGARET BYRNE IKEDA, Esq. (SBN 222303)  
**BARBOSA, METZ, IKEDA & HARRISON, LLP**  
 3 17547 Ventura Blvd., Suite 310  
 Encino, CA 91316  
 4 Tel: (818) 386-1200  
 Fax: (818) 386-1212  
 5 PBarbosa@bmihlaw.com  
JMetz@bmihlaw.com  
 6 MIkeda@bmihlaw.com

7 Attorneys for Plaintiff, CONNIE ARNOLD

8 KATHLEEN E. FINNERTY (SBN 157638)  
**GREENBURG & TRAUIG, LLP**  
 9 1201 K Street, Suite 1100  
 Sacramento, CA 95814-3938  
 10 Tel: (916) 442-1111  
 Fax: (916) 448-1709  
 11 FinnertyK@gtlaw.com

12 Attorneys for Defendant, W2005/FARGO HOTELS (POOL C) REALTY, L.P.

13  
 14 UNITED STATES DISTRICT COURT  
 15 EASTERN DISTRICT OF CALIFORNIA

16 CONNIE ARNOLD,  
 17 Plaintiff,

Case No: 1:09-CV-01644-AWI-SMS  
Civil Rights

18 v.

19 MARRIOTT INTERNATIONAL,  
 20 INC. dba FAIRFIELD INN  
 MARRIOTT-VISALIA;  
 21 W2005/FARGO HOTELS (POOL  
 C) REALTY, L.P. and DOES 1  
 22 through 35, Inclusive,

**JOINT STIPULATION AND ORDER  
 REGARDING CONTINUANCE OF  
 EXPERT DISCLOSURE AND  
 DISCOVERY DEADLINES**

Trial Date: June 28, 2011  
 Time: 8:30 a.m  
 Courtroom: 2

23 Defendants.

**JOINT STIPULATION**

24  
 25  
 26 Plaintiff CONNIE ARNOLD and Defendant W2005/FARGO HOTELS (POOL  
 27 C) REALTY, L.P. hereby submit this Joint Stipulation and [Proposed] Order continuing  
 28 the following discovery deadlines in the above-captioned case:

---

JOINT STIPULATION AND [PROPOSED] ORDER REGARDING CONTINUANCE OF EXPERT  
 DISCLOSURE AND DISCOVERY DEADLINES (CASE NO. 1:09-cv-01644-AWI-SMS)

1 WHEREAS, on July 16, 2009, Plaintiff filed the present action;  
2 WHEREAS, on July 23, 2009, Defendant filed its Answer to Plaintiff's  
3 Complaint;

4 WHEREAS, on January 19, 2010, the Court issued its scheduling order setting  
5 forth the following discovery deadlines:

- 6 Expert Disclosures.....September 30, 2010
- 7 Expert Disclosures – Rebuttals (FRCP 26(a)(2)).....October 29, 2010

8 WHEREAS, the parties are working together to resolve the matter and request that  
9 the court grant this Joint Stipulation to Regarding Continuance of Expert Disclosure and  
10 Expert Discovery Deadlines in order to allow the parties to continue settlement  
11 negotiations, and

12 WHEREAS, this is a first continuance requested by the parties and this  
13 continuance does not alter the Trial date set in this matter.

14 NOW, THEREFORE, IT IS HEREBY JOINTLY STIPULATED, by and between  
15 the parties, through their respective counsel of record, and subject to the Court's approval,  
16 that the dates previously set by this Court be continued as follows:

17 Old Date	Proposed Date	Deadline
18 September 30, 2010	November 15, 2010	Expert Disclosures
19 October 29, 2010	December 15, 2010	Expert Disclosures – Rebuttals 20 (FRCP 26(a)(2))
21 No date previously set	January 14, 2011	Expert Discovery Cut-off

22  
23 IT IS SO STIPULATED.

24  
25 Dated: September 20, 2010 BARBOSA, METZ, IKEDA & HARRISON, LLP

26  
27 \_\_\_\_\_  
/s/ Jordon Metz  
JORDON METZ  
28 Attorneys for Plaintiff, CONNIE ARNOLD

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

Dated: September 20, 2010

GREENBURG & TRAURIG, LLP

          /s/Kathleen E. Finnerty            
KATHLEEN E. FINNERTY  
Attorneys for Defendant  
W2005/FARGO HOTELS (POOL C)  
REALTY, L.P.

IT IS SO ORDERED.

Dated: September 20, 2010

          /s/ Sandra M. Snyder            
UNITED STATES MAGISTRATE JUDGE