1	PATRICIA BARBOSA, Esq. (SBN 125865)		
2	JORDON METZ, Esq. (SBN 167355) MARGARET BYRNE IKEDA, Esq. (SBN 222303)		
3	BARBOSA, METZ, IKEDA & HARR 17547 Ventura Blvd., Suite 310	ISON, LLP	
4	Encino, CA 91316 Tel: (818) 386-1200		
5	Fax: (818) 386-1212 PBarbosa@bmihlaw.com		
6	JMetz@bmihlaw.com MIkeda@bmihlaw.com		
7	Attorneys for Plaintiff, CONNIE ARNOLD		
8	KATHLEEN E. FINNERTY (SBN 157638)		
9	GREENBURG & TRAURIG, LLP 1201 K Street, Suite 1100 Sacramento, CA 95814-3938 Tel: (916) 442-1111 Form (916) 448-1700		
10			
11	Fax: (916) 448-1709 FinnertyK@gtlaw.com		
12	Attorneys for Defendant, W2005/FARGO HOTELS (POOL C) REALTY, L.P.		
13	LINITED STATES DISTRICT COLUT		
14	UNITED STATES DISTRICT COURT EASTERN DISTRICT OF CALIFORNIA		
15	EASTERN DISTRICT OF CALIFORNIA		
16	CONNIE ARNOLD,	Case No: 1:09-CV-01644-AWI-SMS	
17	Plaintiff,	<u>Civil Rights</u>	
18	v.	JOINT STIPULATION AND ORDER REGARDING CONTINUANCE OF	
19	MARRIOTT INTERNATIONAL, INC. dba FAIRFIELD INN	EXPERT DISCLOSURE AND DISCOVERY DEADLINES	
20	MARRIOTT-VISALIA; W2005/FARGO HOTELS (POOL	Trial Date: June 28, 2011	
21	C) REALTY, L.P. and DOES 1 through 35, Inclusive,	Time: 8:30 a.m Courtroom: 2	
22	Defendants.	2	
23			
24 25	IOI	NT STIPULATION	
26		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 al	pove-captioned case:	
	JOINT STIPULATION AND [PROPOSED] ORDER REGARDING CONTINUANCE OF EXPERT DISCLOSURE AND DISCOVERY DEADLINES (CASE NO. 1:09-cv-01644-AWI-SMS)		
	ETI 107 959 612v2 0 20 10	Stip to Extend discovery dates.doc	

PDF created with pdfFactory trial version www.pdffactory.com

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 DisclosuresSeptember 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 a	s follows:		
16 17	that the dates previously Old Date	r set by this Court be continued as Proposed Date	s follows: Deadline		
		,			
17	Old Date September 30, 2010	Proposed Date November 15, 2010	Deadline		
17 18	Old Date	Proposed Date	Deadline Expert Disclosures		
17 18 19	Old Date September 30, 2010	Proposed Date November 15, 2010	Deadline Expert Disclosures Expert Disclosures – Rebuttals		
17 18 19 20	Old Date September 30, 2010 October 29, 2010	Proposed Date November 15, 2010 December 15, 2010	Deadline Expert Disclosures Expert Disclosures – Rebuttals (FRCP 26(a)(2))		
17 18 19 20 21	Old Date September 30, 2010 October 29, 2010	Proposed Date November 15, 2010 December 15, 2010 January 14, 2011	Deadline Expert Disclosures Expert Disclosures – Rebuttals (FRCP 26(a)(2))		
17 18 19 20 21 22	Old Date September 30, 2010 October 29, 2010 No date previously set	Proposed Date November 15, 2010 December 15, 2010 January 14, 2011	Deadline Expert Disclosures Expert Disclosures – Rebuttals (FRCP 26(a)(2))		
17 18 19 20 21 22 23	Old Date September 30, 2010 October 29, 2010 No date previously set	Proposed Date November 15, 2010 December 15, 2010 January 14, 2011 JLATED.	Deadline Expert Disclosures Expert Disclosures – Rebuttals (FRCP 26(a)(2))		
17 18 19 20 21 22 23 24	Old Date September 30, 2010 October 29, 2010 No date previously set IT IS SO STIPU	Proposed Date November 15, 2010 December 15, 2010 January 14, 2011 JLATED.	Deadline Expert Disclosures Expert Disclosures – Rebuttals (FRCP 26(a)(2)) Expert Discovery Cut-off		
17 18 19 20 21 22 23 24 25 26 27	Old Date September 30, 2010 October 29, 2010 No date previously set IT IS SO STIPU	Proposed Date November 15, 2010 December 15, 2010 January 14, 2011 JLATED.	Deadline Expert Disclosures Expert Disclosures – Rebuttals (FRCP 26(a)(2)) Expert Discovery Cut-off Z, IKEDA & HARRISON, LLP		
17 18 19 20 21 22 23 24 25 26	Old Date September 30, 2010 October 29, 2010 No date previously set IT IS SO STIPU Dated: September 20, 2	Proposed Date November 15, 2010 December 15, 2010 January 14, 2011 JLATED. BARBOSA, MET /s/ Jordon M JORDON METZ Attorneys for Plain	Deadline Expert Disclosures Expert Disclosures – Rebuttals (FRCP 26(a)(2)) Expert Discovery Cut-off Z, IKEDA & HARRISON, LLP Letz htiff, CONNIE ARNOLD		
17 18 19 20 21 22 23 24 25 26 27	Old Date September 30, 2010 October 29, 2010 No date previously set IT IS SO STIPU Dated: September 20, 2	Proposed Date November 15, 2010 December 15, 2010 January 14, 2011 JLATED. BARBOSA, MET /s/ Jordon M. JORDON METZ	Deadline Expert Disclosures Expert Disclosures – Rebuttals (FRCP 26(a)(2)) Expert Discovery Cut-off Z, IKEDA & HARRISON, LLP Ietz htiff, CONNIE ARNOLD UANCE OF EXPERT		

1		
2	Dated: September 20, 2010	GREENBURG & TRAURIG, LLP
3	Dated. September 20, 2010	GREENBURG & TRAURIG, EEI
4		/s/Kathleen E. Finnerty KATHLEEN E. FINNERTY
5		Attorneys for Defendant W2005/FARGO HOTELS (POOL C)
6		REALTY, L.P.
7	TE IS SO ODDEDED	
8	IT IS SO ORDERED.	
9	Dated: September 20, 2010	/s/ Sandra M. Snyder UNITED STATES MAGISTRATE JUDGE
10		
11		
12		
13		
14		
15		
16		
17		
18		
19		
20 21		
22		
23		
24		
25		
26		
27		
28		
		DER REGARDING CONTINUANCE OF EXPERT