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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

GARY HENLEY,
Plaintiff,
v.

PACIFIC GAS AND ELECTRIC COMPANY,
LOCAL UNION NUMBER 1245 OF
INTERNATIONAL BROTHERHOOD OF
ELECTRICAL WORKERS, and DOES 1-50,
inclusive,
Defendants.

Case No. 1:10-CV-01119-OWW-GSA

**STIPULATION AND ORDER MODIFYING
SCHEDULING ORDER**

**Trial Date: January 18, 2012
Time: 9:00 a.m.
Courtroom 3, 7th Floor
Honorable Oliver W. Wanger**

Pursuant to Civil Local Rules 143 and 137(b), the parties hereby jointly and respectfully submit a stipulation and proposed order requesting that the Court revise the Scheduling Conference Order such that, while certain discovery dates are modified, the motions deadlines and hearing dates, as well as the Pre-trial Conference and Jury Trial dates remain unchanged.

The parties seek a modification of these dates in order to accommodate a private mediation session with Thomas Simonian, Esq at JAMS mediation on July 11, 2011. The current pre-trial dates, and proposed modifications, are as follows:

<u>Event</u>	<u>Current Date</u>	<u>Proposed Date</u>
Close of non-expert discovery	June 1, 2011	August 5, 2011
Expert disclosures due	July 15, 2011	August 12, 2011
Expert discovery cut-off	August 29, 2011	September 5, 2011
Settlement conference	September 13, 2011	same
Dispositive pre-trial motions due	September 29, 2011	same
Dispositive pre-trial motions hearing	October 31, 2011	same
Joint pre-trial statement due	December 5, 2011	same
Pre-trial conference	December 5, 2011	same
Jury Trial	January 18, 2012	same

The parties believe that the modified schedule will allow the parties an opportunity to participate in a meaningful mediation session while potentially avoiding unnecessary discovery costs.

Dated: May 5, 2011

Respectfully submitted,

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/s/ Nicole Howell Neubert

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Gary Henley

Good cause having been shown, the pre-trial dates in this matter are modified as set out above.

IT IS SO ORDERED.

Dated: May 6, 2011

/s/ Oliver W. Wanger
UNITED STATES DISTRICT JUDGE