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10 Attorneys for Plaintiff, HILDA L. SOLIS, Secretary of Labor,
 11 United States Department of Labor

12 IN THE UNITED STATES DISTRICT COURT FOR THE
 13 EASTERN DISTRICT OF CALIFORNIA

14	HILDA L. SOLIS, Secretary of Labor,)	Case No. 1:11-cv-00529 AWI-GSA
15	United States Department of Labor,)	
16)	STIPULATION AND ORDER
17	Plaintiff,)	EXTENDING NON-EXPERT DISCOVERY
18	v.)	DEADLINE
19)	
20	NATIONAL EMERGENCY MEDICAL)	
21	SERVICES ASSOCIATION,)	
22)	
23	Defendant.)	
24)	

25 Plaintiff, Hilda L. Solis, Secretary of Labor, United States Department of Labor, and
 26 Defendant, National Emergency Medical Services Association, through its counsel of record,
 27 respectfully request a continuance of the expert discovery deadline due to the following:

28 1. At present, the non-expert discovery cut-off is April 2, 2012. However, due to
 scheduling conflicts involving two of Plaintiff’s principle witnesses (Vivian Thorbourne and
 David Pinck) and one of Defendant’s principle witnesses (Torren Colcord), the parties have
 been unable to complete these depositions to date. The depositions of Mr. Pinck and Ms.
 Thorbourne are set for March 29 and 30, 2012, and a date has yet to be confirmed for the

1 deposition of Mr. Colcord. Moreover, once these depositions are completed, the information
2 secured at these proceedings may justify depositions of additional witnesses.

3
4 2. The expert discovery cut-off is May 23, 2012. The parties desire, and hereby
5 stipulate, to continue the non-expert discovery deadline to conclude concurrently with the expert
6 discovery cut-off so that the other dates identified in the Court's Scheduling Order will remain
7 unaffected.

8 Dated: March 21, 2012

BENJAMIN B. WAGNER
United States Attorney

9
10 By /s/ Glen F. Dorgan
11 Glen F. Dorgan
12 Assistant United States Attorney
13 Attorney for Plaintiff,
14 HILDA L. SOLIS, Secretary of Labor,
United States Department of Labor

15 Dated: March 21, 2012

GOYETTE & ASSOCIATES, INC.

16 /s/ Paul Goyette
17 Paul Goyette
18 Attorney for Defendant
National Emergency Medical Services Association

19
20 **ORDER**

21 IT IS HEREBY ORDERED that the non-expert discovery deadline be moved from April
22 2, 2012, to May 23, 2012. All other dates and deadlines set forth in the Court's Scheduling
23 Order remain in effect.

24
25
26 IT IS SO ORDERED.

27 Dated: March 21, 2012

/s/ Gary S. Austin
UNITED STATES MAGISTRATE JUDGE