

1 BARAK VAUGHN (SBN 227926)  
 2 VAUGHN LEGAL GROUP  
 3 23622 Calabasas Rd., Suite 220  
 4 Calabasas, California 91302  
 5 Tel: 818-223-8109  
 6 Fax: 818-223-8475  
 7 barak@vaughnlegalgroup.com

8 Attorneys for Plaintiff,  
 9 GENERAL SECURITY SERVICES CORPORATION

10 KEVIN BRIGGS  
 11 County Counsel  
 12 MICHAEL R. LINDEN (SBN 192485)  
 13 Deputy County Counsel  
 14 FRESNO COUNTY COUNSEL  
 15 2220 Tulare Street, 5<sup>th</sup> Floor  
 16 Fresno, California 93721

17 Attorneys for Defendant,  
 18 COUNTY OF FRESNO

19 **UNITED STATES DISTRICT COURT**

20 **EASTERN DISTRICT OF CALIFORNIA – FRESNO DIVISION**

21 GENERAL SECURITY SERVICES  
 22 CORPORATION,

23 Plaintiff,

24 vs.

25 COUNTY OF FRESNO,

26 Defendant.

Case No. 1:11-cv-00724 AWI MJS

**STIPULATION TO MODIFY  
 SCHEDULING ORDER; ORDER  
 THEREON**

27 Plaintiff, GENERAL SECURITY SERVICES CORPORATION (hereinafter  
 28 “GSSC”), by and through its attorney Barak Vaughn, Esq. of the Vaughn Legal  
 Group and Defendant, COUNTY OF FRESNO (hereinafter “County”), by and  
 through its attorney of record, Michael R. Linden, of the Fresno County Counsel,  
 do and hereby present the following Stipulation to Agree to Modify the current

1 Scheduling Order in the above-captioned action.

2 **RECITALS**

3 WHEREAS, on September 29, 2011, the Court issued its initial Scheduling  
4 Order cutting off non-expert discovery on June 1, 2012.

5 WHEREAS, on January 13, 2012, Plaintiff propounded on Defendant  
6 Plaintiff's Interrogatories (Set One), Requests for Admissions (Set One), and  
7 Requests for Identification of Documents (Set One).

8 WHEREAS, the parties engaged in extensive meet and confer efforts  
9 regarding the aforementioned discovery.

10 WHEREAS, the parties stipulated and the Honorable Michael Seng ordered  
11 this Court's previous Scheduling Order be modified to extend the non-expert  
12 discovery cut-off date from June 1, 2012 to July 6, 2012, and to extend the expert  
13 discovery cut-off date and the last day to file a non-dispositive motion, from August  
14 1, 2012 to August 22, 2012. This Order was filed on May 1, 2012.

15 WHEREAS, the parties participated in a discovery dispute hearing on May  
16 23, 2012. During the hearing, the parties agreed to extend both expert and non-  
17 expert discovery cut off dates, should it be necessary.

18 WHEREAS, the parties have met, conferred, and determined non-expert  
19 discovery and non-expert discovery cut-off dates must be extended at least ninety  
20 (90) days; and that all other operative dates in this Court's existing Scheduling  
21 Order too must be extended at least ninety (90) days.

22 **STIPULATION**

23 For good cause showing, IT IS HEREBY STIPULATED AND AGREED, by  
24 and between the parties, through their respective attorneys of record, that:

25 1. The non-expert discovery cut-off date is extended from July 6, 2012 to  
26 October 8, 2012.

27 2. The expert discovery cut-off date, and the last day to file a non-  
28

1 dispositive motion is extended from August 22, 2012 to November 30, 2012.

2 3. The deadline for the disclosure of expert witnesses is extended from  
3 August 1, 2012 to November 1, 2012.

4 4. The deadline to file a dispositive motion is extended from September  
5 7, 2012 to December 14, 2012.

6 5. The pre-trial conference date is extended from December 4, 2012 to  
7 March 4, 2013.

8 6. The trial date is extended from January 29, 2013 to April 1, 2013.  
9

10 **IT IS SO STIPULATED.**

11  
12 Dated: June 14, 2012

VAUGHN LEGAL GROUP

13 /s/ Barak Vaughn

14  
15 \_\_\_\_\_  
16 Barak Vaughn, Esq.  
17 Attorneys for Plaintiff,  
18 GENERAL SECURITY SERVICES  
19 CORPORATION

18 Dated: June 5, 2012

FRESNO COUNTY COUNSEL

19 /s/ Michael Linden

20  
21 \_\_\_\_\_  
22 Kevin Briggs  
23 *County Counsel*  
24 Michael R. Linden  
25 *Deputy County Counsel*  
26 Attorneys for Defendant,  
27 COUNTY OF FRESNO

28  
**ORDER**

GOOD CAUSE APPEARING, the above Stipulation is approved,

1 and the Scheduling Order shall be modified to reflect the new stipulated dates set  
2 forth above.

3

4

5 IT IS SO ORDERED.

6

7 Dated: June 14, 2012

/s/ Michael J. Seng  
UNITED STATES MAGISTRATE JUDGE

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28