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STEPHEN ESCOBAR
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15 UNITED STATES DISTRICT COURT
16 EASTERN DISTRICT OF CALIFORNIA
17 FRESNO DIVISION

18 SAVE MART SUPERMARKETS,

19 Plaintiff,

20 vs.

21 STEPHEN ESCOBAR,

22 Defendant.

Case No.: 1:11-CV-01685-LJO-GSA

**STIPULATION AND ORDER
CONTINUING NON-EXPERT AND
EXPERT DISCOVERY DEADLINES**

23
24 Plaintiff SAVE MART SUPERMARKETS and Defendant STEPHEN ESCOBAR hereby
25 stipulate, by and through their respective counsel, to continue the dates by which the parties are
26 required to complete non-expert and expert discovery. The current deadlines for completion of
27 non-expert and expert discovery were set by the Court's March 17, 2012 Scheduling Conference
28 Order (Docket # 17).

1 The parties agree and respectfully request that the deadlines for non-expert and expert
2 discovery be continued for thirty (30) days, as follows:

<u>Event</u>	<u>Deadline Set by Scheduling Conference Order</u>	<u>[Proposed] Continued Date</u>
3 Non-Expert Discovery 4 Cutoff	5/31/12	7/2/12
6 Expert Disclosure	6/21/12	7/23/12
7 Supplemental Expert 8 Disclosure	7/11/12	8/10/12
9 Expert Discovery Cutoff	7/31/12	8/30/12

11 The parties respectfully make this request because the parties believe that an approximately
12 30-day extension is mutually convenient for all counsel and parties and will give the parties
13 additional time to continue settlement negotiations.

14 The parties have made no other modifications to deadlines in the case.

15 The parties' current request for a continuance of the non-expert and expert discovery
16 deadlines will not alter any other dates or deadlines set by Court order.

17 DATED: April 19, 2012

LAW OFFICES OF ROGER A. MOORE

19
20 By: /s/ Roger A. Moore
21 Roger A. Moore
22 Attorneys for Defendant
STEPHEN ESCOBAR

23 DATED: April 19, 2012

TRUCKER ♦ HUSS

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25 By: /s/ Clarissa A. Kang
26 Clarissa A. Kang
27 Attorneys for Plaintiff
SAVE MART SUPERMARKETS

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I attest that my firm has obtained Mr. Moore's concurrence in the filing of this document.

DATED: April 19, 2012

TRUCKER ♦ HUSS

By: /s/ Clarissa A. Kang
Clarissa A. Kang

IT IS SO ORDERED.

Dated: April 20, 2012

/s/ Gary S. Austin
UNITED STATES MAGISTRATE JUDGE