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

MARK A. NAVA, GLORIA D. NAVA, and MONIQUE A. NAVA	)	CASE NO.: 1:12-CV-00010-AWI-JLT
	)	
Plaintiffs,	)	STIPULATION AND ORDER AMENDING THE
	)	SCHEDULING ORDER
vs.	)	
	)	
CITY OF SHAFTER, and DOES 1 to 100,	)	
Inclusive,	)	
	)	
Defendants.	)	
	)	

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**STIPULATION**

Undersigned counsel for Plaintiffs, MARK A. NAVA, GLORIA D. NAVA, AND MONIQUE A. NAVA, and undersigned counsel for Defendants, CITY OF SHAFTER and DOES 1 to 100, all of the parties who have appeared and remain in this action, hereby stipulate and agree as follows:

**RECITALS**

Whereas:

- 1. The currently scheduled deadline to end Non-Expert disclosure is November 1, 2013, the Parties hereby stipulate to extend that cut off to November 7, 2013.
- 2. Undersigned counsel stipulate and agree that the Court should enter an Order amending the scheduling order in this case for the only purpose of extending the non-expert discovery cut off

1 to November 7, 2013. No other changes are requested or stipulated to.

2 3. The parties so stipulate because:

- 3 (a) The final deposition of a Person Most Qualified with a production of documents was  
4 scheduled on today's date, October 22, 2013;
- 5 (b) Documents, including the learning domains, were provided were provided on a CD, and  
6 were not reviewable by counsel at the time of the deposition;
- 7 (c) The deponent also had an outstanding question pending to POST regarding the timeliness  
8 of the documents provided;
- 9 (d) To have the opportunity to review the documents and have the outstanding question  
10 answered, the parties agreed to adjourn the deposition to another date;
- 11 (e) Due to Counsel and deponent's schedules, the first day available is November 6, 2013;
- 12 (f) Therefore, the parties would request that the Court extend the Non-expert discovery  
13 deadline to November 7, 2013 for the sole purpose of finishing the deposition of the  
14 Person Most Qualified.

15  
16 Dated: October 23, 2013

RODRIGUEZ & ASSOCIATES

/s/ Martha Rossiter

17  
18 By:

DANIEL RODRIGUEZ, ESQ.  
JOEL T. ANDREESON, ESQ.  
MARTHA ROSSITER, ESQ.  
Attorneys for Plaintiffs  
MARK A. NAVA, GLORIA D. NAVA, AND  
MONIQUE A. NAVA

19  
20  
21  
22  
23 Dated: October 23, 2013

WALL, WALL & PEAKE

/s/ Michael Allford

24  
25 By:

MICHAEL ALLFORD, ESQ.  
Attorney for Defendant  
CITY OF SHAFTER

1 **ORDER**

2 Based upon the stipulation of the parties, **IT IS HEREBY ORDERED:** The parties **SHALL**  
3 complete all discovery pertaining to non-experts on or before **November 7, 2013.** All other deadlines  
4 in the Court’s scheduling order shall remain the same.

5  
6 IT IS SO ORDERED.

7 Dated: October 24, 2013

8 /s/ Jennifer L. Thurston  
9 UNITED STATES MAGISTRATE JUDGE