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7 Attorneys for Defendants  
Castlerock Farming and Transport, Inc.,  
8 And Albert L. Good

9 UNITED STATES DISTRICT COURT  
10 EASTERN DISTRICT OF CALIFORNIA – FRESNO DIVISION

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12 MARIA G. MORENO, ESTHER L. ) **Case No. 1:12-CV-00556-AWI-BAK**  
LOPEZ, FRANCISCO OROZCO, ) **(BAM)**  
13 ABRAHAM ORTIZ, JAVIER GARCIA, ) ~~PROPOSED~~ STIPULATED ORDER  
FLORENCIA GUTIERREZ, and ISRAEL ) REGARDING SUMMARY JUDGMENT  
14 LOPEZ on behalf of themselves and all ) BRIEFING SCHEDULE  
other similarly situated, )  
15 ) *Judge: Honorable Andrew W. Ishii*  
Plaintiffs, ) *Magistrate Judge: Hon. Barbara A.*  
16 ) *McAuliffe*  
vs. )  
17 )  
18 CASTLEROCK FARMING AND )  
TRANSPORT, INC., J.L. PADILLA & )  
19 SONS LABOR SERVICE, INC., MELBA )  
NUNEZ CONTRACTING (form unknown), )  
ALBERT L. GOOD, individual, and Does )  
20 2-20, inclusive, )  
21 )  
Defendants. )  
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1           WHEREAS on July 7, 2022, the Court issued a minute order setting the following  
2 briefing schedule for Castlerock Farming and Transport, Inc.’s (“Castlerock”) joint employer  
3 summary judgment motion and Defendant Albert L. Good’s safe harbor summary judgment  
4 motion: “Motion Filing Deadline: October 28, 2022; Opposition Deadline: February 17, 2023;  
5 Reply Deadline: 14 days after date opposition filed” (Dkt. 98);

6           WHEREAS the Court’s July 7 Order also recognized that “Defendants anticipate  
7 completing depositions of the named plaintiffs in advance of filing any summary judgment  
8 motion” (*id.*);

9           WHEREAS counsel for Castlerock and Mr. Good and counsel for Plaintiffs have been  
10 meeting and conferring diligently since July to schedule Plaintiffs’ depositions but have been  
11 unable to do so due to scheduling conflicts, including a trial set for September 26, 2022, in Los  
12 Angeles County Superior Court;

13           WHEREAS the parties anticipate that Plaintiffs’ depositions will take place in the latter  
14 half of October, 2022; and

15           WHEREAS counsel for Castlerock and Mr. Good and counsel for Plaintiffs have also  
16 given significant focus and attention to settlement discussions, which would obviate the need for  
17 summary judgment motions, and anticipate continuing to do so as the case progresses;

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1 It is hereby STIPULATED AND AGREED, by and between Castlerock, Mr. Good, and  
2 Plaintiffs that Castlerock's joint employer summary judgment motion and Mr. Good's safe  
3 harbor summary judgment motion shall be due December 21, 2022, Plaintiffs' opposition  
4 deadline shall be April 5, 2023, and defendants' reply deadline shall be 14 days after the date the  
5 opposition is filed.

6 September 22, 2022

So Stipulated,

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/s/ Andres Holguin-Flores  
Andres Holguin-Flores  
MEXICAN AMERICAN LEGAL DEFENSE AND  
EDUCATIONAL FUND  
*Attorneys for Plaintiffs*

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/s/ James M. Hanlon, Jr.  
James M. Hanlon, Jr.  
GLYNN, FINLEY, MORTL,  
HANLON & FRIEDENBERG, LLP Attorneys for  
Defendants Castlerock Farming and Transport, Inc.,  
And Albert L. Good

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ORDER

Pursuant to the stipulation of the parties and for the reasons set forth therein, the Court ORDERS that Castlerock Farming and Transport, Inc's joint employer summary judgment motion and Albert L. Good's safe harbor summary judgment motion shall be due December 21, 2022, Plaintiffs' opposition deadline shall be April 5, 2023, and defendants' reply deadline shall be 14 days after the date the opposition is filed. Counsel are reminded that settlement discussions do not constitute good cause for a continuance, and any future request on that basis will be denied.

IT IS SO ORDERED.

Dated: October 4, 2022

/s/ Barbara A. McAuliffe  
UNITED STATES MAGISTRATE JUDGE