

1 McGREGOR W. SCOTT  
United States Attorney  
2 ALYSON A. BERG  
Assistant United States Attorney  
3 2500 Tulare Street, Suite 4401  
4 Fresno, California 93721  
Telephone: (559) 497-4000  
5 Facsimile: (559) 497-4099  
6 Attorneys for Defendant  
United States of America  
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8 **UNITED STATES DISTRICT COURT**  
9 **EASTERN DISTRICT OF CALIFORNIA**

10  
11 GREGORY EDISON,  
12 Plaintiff,  
13 v.  
14 UNITED STATES OF AMERICA; THE GEO  
GROUP, INC.; MANAGEMENT AND  
15 TRAINING CORPORATION,  
16 Defendants.  
17

Case No. 1:12-cv-02026-AWI-JLT

**STIPULATION AND [PROPOSED]  
ORDER TO SET SETTLEMENT  
CONFERENCE AND MODIFYING  
SCHEDULING ORDER TO EXTEND  
TIME FOR EXPERT DISCOVERY**  
(Doc. 120)

18 Plaintiff Gregory Edison, and the Defendants United States of America (“United States”), and  
19 Management & Training Corporation (“MTC”) (collectively “the parties”), by and through their  
20 respective counsel, respectfully submit this stipulation and proposed order setting a settlement  
21 conference for March 5, 2018, and modifying the scheduling order to allow expert discovery to extend  
22 beyond the dates currently set in the scheduling order. All parties have been engaging in settlement  
23 discussions, and are interested in resolving the case without incurring further attorneys fees or costs.  
24 Therefore, the parties request the assistance of the Honorable Jennifer L. Thurston to resolve this case  
25 with a settlement conference at 10:00 a.m. on March 5, 2018, which date has been cleared with the  
26 Court.

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1 Additionally, in an effort to focus on settlement negotiations, the parties, by and through their  
2 respective counsel, stipulate and respectfully request the brief continuation of the expert dates outlined  
3 below. The proposed date changes will not affect the November 6, 2018 trial date. The current and  
4 proposed schedules are provided below for the Court's reference.

	<u>Current</u>	<u>Proposed</u>
5		
6 Plaintiff's Expert Disclosures	2/23/2018	3/09/18
7 Defendants' Expert Disclosures	3/09/2018	3/23/18
8 Rebuttal Expert Disclosures	3/23/2018	4/02/18

9 Respectfully submitted,  
10 DATED: February 13, 2018  
11 McGREGOR W. SCOTT  
12 United States Attorney

13 By: /s/Alyson A. Berg  
14 ALYSON A. BERG  
15 Assistant United States Attorney  
16 Attorneys for Defendant,  
17 United States of America

18 BOUCHER, LLP

19 DATED: February 13, 2018  
20 By: *(As authorized 02/13/18)*  
21 /s/Brian M. Bush/  
22 HERMEZ MORENO  
23 RAYMOND PAUL BOUCHER  
24 MILIN CHUN  
25 BRIAN M. BUSH  
26 Attorneys for Plaintiff

27 BURKE, WILLIAMS & SORENSEN LLP

28 DATED: February 13, 2018  
By: *(As authorized 02/13/18)*  
/s/Kristina D. Gruenberg  
KRISTINA D. GRUENBERG  
Attorneys for Defendant MTC

**ORDER**

Based upon the stipulation counsel, the Court **ORDERS**:

1. The Court sets a settlement conference on March 5, 2018 at **1:30 p.m.**;
2. The case schedule is modified as follows:
  - a. Plaintiff's expert disclosure: **March 9, 2018**;
  - b. Defendants' expert disclosure: **March 23, 2018**;
  - c. Plaintiff's rebuttal expert disclosure: **April 2, 2018**;
  - d. Expert discovery deadline: **April 27, 2018**

IT IS SO ORDERED.

Dated: **February 15, 2018**

**/s/ Jennifer L. Thurston**  
UNITED STATES MAGISTRATE JUDGE