

1 SEYFARTH SHAW LLP
Mark P. Grajski (SBN 178050)
2 Email: mgrajski@seyfarth.com
400 Capitol Mall, Suite 2350
3 Sacramento, California 95814-4428
Telephone: (916) 448-0159
4 Facsimile: (916) 558-4839

5 Attorney for Defendant
DEVRY UNIVERSITY, INC.

6 LAW OFFICES OF PARNELL FOX
7 Parnell Fox (SBN 186519)
Email: parnell@parnellfoxlaw.com
8 4908 Lakewood Court
Visalia, California 93291
9 Telephone: (310) 890-0435
Facsimile: (310) 776-6918

11 UNITED STATES DISTRICT COURT
12 EASTERN DISTRICT OF CALIFORNIA

14 LORENA LOPEZ,

15 Plaintiff,

16 v.

17 DEVRY UNIVERSITY, INC.; an Illinois
corporation and DOES 1-100, inclusive,

18 Defendants.
19

Case No. 1:13-CV-00844-AWI-MJS

**STIPULATION TO CONTINUE EXPERT
DISCOVERY CUTOFF AND PLAINTIFF'S
MOTION TO COMPEL SUPPLEMENTAL
DISCOVERY RESPONSES DEADLINE;
ORDER**

Date Action Filed: March 21, 2013

20 DeVry University ("Defendant") and Lorena Lopez ("Plaintiff") (collectively referred to herein
21 as the "Parties"), by and through their undersigned counsel, hereby stipulate and agree as follows:

- 22 1. WHEREAS, the deadline to complete expert discovery is July 7, 2014.
- 23 2. WHEREAS, the deadline to file discovery motions is July 7, 2014.
- 24 3. WHEREAS, the Parties have worked diligently to coordinate and schedule the
25 depositions of two non-retained healthcare providers of Plaintiff identified in Plaintiff's Expert Witness
26 Disclosure, Isabel C. Amancio, LMFT, 113 Church Street, #418, Visalia, California, and Shyam
27 Bhaskar, MD, 231, W. Noble Avenue, Visalia, California 93277;
- 28

1 4. WHEREAS, Defendant served subpoenas for deposition testimony and production of
2 documents on Ms. Amancio and Dr. Bhaskar for late June 2014 depositions;

3 5. WHEREAS, Dr. Bhaskar advised the Parties that he was completely unavailable prior to
4 this time and, further, that he would out of the country until August 2014.

5 6. WHEREAS, the Parties further believe that the most cost efficient approach to expert
6 depositions in this case would be to take both in a single day, particularly because of Defendant's need
7 to travel from Sacramento to Visalia;

8 7. WHEREAS, the Parties have also worked diligently to meet and confer on written
9 discovery propounded by Plaintiff, including two sets of requests for production of documents and
10 interrogatories. Defendant anticipates supplemental responses will be served by July 15, 2014 and
11 thereafter Plaintiff will need additional time to review and determine if a motion to compel further
12 responses is necessary.

13 8. WHEREAS, the parties have agreed that discovery shall remain open to September 8,
14 2014 only for the following: (1) Defendant to depose Plaintiff's healthcare experts Shyam Bhaskar, M.D.
15 and Isabel Amancio, MFT; and (2) Defendant to prepare and serve supplemental discovery responses
16 (per Plaintiff's February 3, 2014 and Defendant's February 21, 2014 meet and confer correspondence),
17 and Plaintiff to move to compel such supplemental responses if necessary.

18 9. WHEREAS, extending the deadline for expert discovery and Plaintiff's motion to compel
19 supplemental written discovery responses will not result in a change to subsequent deadlines regarding
20 the January 6, 2015 trial date.

21 **NOW THEREFORE**, all Parties hereto stipulate and agree that the Court may enter an Order
22 extending discovery to September 8, 2014 for: (1) Defendant to depose Plaintiff's healthcare experts
23 Shyam Bhaskar, M.D. and Isabel Amancio, MFT; and (2) Defendant to prepare and serve supplemental
24 discovery responses (per Plaintiff's February 3, 2014 and Defendant's February 21, 2014 meet and
25 confer correspondence) and Plaintiff to move to compel such supplemental responses if necessary.
26 Plaintiff reserves the right to file a motion and seek leave for additional discovery subject to the Court's
27 approval and good cause shown.
28

