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

10 RICHARD NUWINTORE,  
11 Plaintiff,  
12 v.  
13 UNITED STATES OF AMERICA;  
14 MANAGEMENT AND TRAINING  
CORPORATION,  
15 Defendants.  
16

Case No. 1:13-cv-00967-AWI-JLT

**JOINT STIPULATION TO CONTINUE  
STATUS CONFERENCE AND  
[PROPOSED] ORDER**

**(Doc. 95)**

17 Plaintiff Richard Nuwintore (“Plaintiff”), Defendants United States of America (“United  
18 States”), and Management & Training Corporation (“MTC”) (collectively “the parties”) stipulate, by  
19 and through the undersigned counsel, to continue the Status Conference approximately thirty (30)  
20 days to allow for the Ninth Circuit’s Opinion in *Edison v. United States, et al.*, Ninth Circuit Case  
21 No. 14-15472, and *Nuwintore v. United States, et al.*, Ninth Circuit Case No. 14-17546 to be  
22 finalized.

23 The parties base this stipulation on good cause, which includes that on July 19, 2016, the  
24 United States filed a petition for rehearing in *Edison v. United States, et al.*, Ninth Circuit Case  
25 No. 14-15472, and *Nuwintore v. United States, et al.*, Ninth Circuit Case No. 14-17546. If granted  
26 on any or all the bases raised in the United States’ petition, this could affect the amendments  
27 proposed by plaintiff or whether and to what extent the United States is obligated to answer an  
28 amended complaint. Accordingly, the parties request the status conference be continued

1 approximately thirty (30) days to allow for a ruling on the pending petition.

2 Based on the showing of good cause stated above, the parties stipulate to continue the  
3 Status Conference on August 8, 2016 to September 7, 2016 and Joint Status Report deadline on  
4 August 1, 2016 to August 31, 2016.

5 DATED: July 27, 2016

FELDMAN & WALLACH, LLP

(As authorized 7/27/2016)

/s/ Ian Wallach

IAN WALLACH

JASON FELDMAN

Attorneys for Plaintiff, Gregory Edison

9 DATED: July 27, 2016

BURKE, WILLIAMS & SORENSEN, LLP

(As authorized 7/27/2016)

/s/ Susan E. Coleman

KRISTINA GRUENBERG

SUSAN E. COLEMAN

Attorneys for Defendant,  
Management & Training Corporation

14 DATED: July 27 , 2016

PHILLIP A. TALBERT

Acting United States Attorney

(As authorized 7/27/2016)

/s/ Alyson A. Berg

ALYSON A. BERG

Assistant United States Attorney

Attorneys for Defendant,

United States of America

20 **[PROPOSED] ORDER**

21 Having reviewed the stipulation submitted by the parties and for good cause showing, the  
22 status conference currently set for August 8, 2016 is hereby continued to **September 9, 2016** at  
23 9:30 a.m. The parties shall file a joint status report no later than **September 2, 2016**.  
24

25 IT IS SO ORDERED.

26 Dated: **July 27, 2016**

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

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