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11 Attorneys for Defendants/Cross-Defendants/Cross-Complainants  
12 YOUNG'S COMMERCIAL TRANSFER, INC. and RIGOBERTO FERNANDEZ JIMENEZ,  
13 individually and doing business as JIMENEZ TRUCKING

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21 NATIONAL RAILROAD PASSENGER  
CORPORATION aka AMTRAK,  
22 BNSF RAILWAY COMPANY  
and BARBARA NEU

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1 UNITED STATES DISTRICT COURT  
2 EASTERN DISTRICT OF CALIFORNIA – FRESNO DIVISION

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4 NATIONAL RAILROAD PASSENGER CORPORATION,

5 Plaintiff,

6 v.

7 YOUNG’S COMMERCIAL TRANSFER, INC., a corporation, and RIGOBERTO FERNANDEZ JIMENEZ, an individual, d/b/a JIMENEZ TRUCKING,

8 Defendants.

Case No. 1:13-CV-01506-AWI-GSA

[Consolidated with 1:13-cv-02085-AWI-GSA, *Celia Ramirez v. Rigoberto F. Jimenez, et al.*]

**STIPULATION TO CONTINUE DISCOVERY DEADLINES AND ORDER**

(ECF No. 33)

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11 AND CONSOLIDATED ACTION.

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14 The parties have met and conferred regarding discovery and mediation in this matter. A  
15 defense medical examination of Plaintiff was done on January 23, 2015 by Dr. Kurt Miller. The  
16 report of that IME was just received on April 3, 2015. After deposing the plaintiff, the parties  
17 intend to mediate the Ramirez case. The continuance of discovery cut-off dates would allow this  
18 to be accomplished. The trial and pre-trial conference dates remain the same.

19 IT IS HEREBY STIPULATED by and between the parties hereto, through their respective  
20 attorneys of record, that dates in the Order on Amended Stipulation to Continue Trial Date and  
21 Discovery Deadlines dated November 14, 2014, Document 33, be modified as follows:

22 Non Expert Discovery Cutoff:	September 14, 2015
23 Expert Disclosure:	September 18, 2015
24 Rebuttal Expert Disclosure:	October 9, 2015
25 Expert Discovery Cutoff:	November 13, 2015
26 Non-dispositive Motion Filing Deadline:	November 16, 2015

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Dispositive Motion Filing Deadline: December 18, 2015

The following dates remain unchanged:

Pretrial Conference February 18, 2016

Trial April 19, 2016

DATED: April 17, 2015

REICH LAW FIRM

By /s/ Jeff Reich  
Jeff Reich  
Attorney for Plaintiff  
CELIA RAMIREZ

DATED: April 17, 2015

EMERSON • SORENSEN • CHURCH

By /s/ James D. Emerson  
James D. Emerson  
Attorney for Defendants/Cross-  
Defendants/Cross-Complainants YOUNG'S  
COMMERCIAL TRANSFER, INC. and  
RIGOBERTO FERNANDEZ JIMENEZ,  
individually and dba JIMENEZ TRUCKING

DATED: April 17, 2015

LOMBARDI LOPER & CONANT, LLP

By /s/ B. Clyde Hutchinson  
B.Clyde Hutchinson  
Attorney for Plaintiff/Defendants/Cross-  
Defendants/Cross-Complainants, NATIONAL  
RAILROAD PASSENGER CORPORATION  
aka AMTRAK, BNSF RAILWAY COMPANY  
and BARBARA ANN NEU

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**ORDER**

The Court, having considered the parties' Stipulation to Continue Discovery Deadlines (ECF No. 33), has adjusted the parties' proposed dates (as underlined below) and orders the following deadlines to be continued as follows:

Non Expert Discovery Cutoff:	September 14, 2015
Expert Disclosure:	September 18, 2015
Rebuttal Expert Disclosure:	October 9, 2015
Expert Discovery Cutoff:	November 13, 2015
Non-dispositive Motion Filing Deadline:	November 16, 2015
Dispositive Motion Filing Deadline:	December 18, 2015
<u>Pretrial Conference:</u>	<u>March 24, 2016</u>
	<u>Time: 10:00 a.m.</u>
	<u>Courtroom 2 (AWI)</u>
<u>Trial:</u>	<u>May 24, 2016</u>
	<u>Time: 8:30 a.m.</u>
	<u>Courtroom 2 (AWI)</u>

IT IS SO ORDERED.

Dated: April 23, 2015

/s/ Gary S. Austin  
UNITED STATES MAGISTRATE JUDGE