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5 Attorneys for Defendants and Cross-Complainants, YOUNG'S COMMERCIAL TRANSFER, INC.
6 and RIGOBERTO FERNANDEZ JIMENEZ, individually and doing business as
JIMENEZ TRUCKING

7
8 UNITED STATES DISTRICT COURT
9 EASTERN DIVISION

10 NATIONAL RAILROAD PASSENGER
11 CORPORATION,

12 Plaintiff,

13 vs.

14 YOUNG'S COMMERCIAL TRANSFER, INC.,
15 a corporation, and RIGOBERTO FERNANDEZ
16 JIMENEZ, an individual,
d/b/a JIMENEZ TRUCKING,

17 Defendants.

Case No. 1:13-CV-01506-AWI-GSA
(Consolidated with Case No.
1:13-CV-02085-AWI-GSA)

**STIPULATION TO CONTINUE
DISCOVERY DEADLINES AND ORDER**

COMPLAINT FILED: September 17, 2013

18 CELIA RAMIREZ,

19 Plaintiff,

20 vs.

21 RIGOBERTO FERNANDEZ JIMENEZ,
22 JIMENEZ TRUCKING, NATIONAL
23 RAILROAD PASSENGER CORPORATION,
24 BARBARA NEU, BNSF RAILWAY
COMPANY, YOUNG'S COMMERCIAL
TRANSFER, INC., and DOES 1 to 200,
Inclusive,

25 Defendants.

COMPLAINT FILED: September 18, 2013

26
27 AND RELATED CROSS-ACTIONS
28

1 The parties have met and conferred regarding discovery and mediation in this matter. The
2 parties are still in the process of taking depositions, after which they intend to mediate the Ramirez
3 case. The continuance of discovery cut-off dates would allow this to be accomplished. These
4 extensions of time will not affect the pending pretrial or trial dates.

5 IT IS HEREBY STIPULATED by and between the parties hereto, through their respective
6 attorneys of record that dates in the Order on Amended Stipulation to Continue Trial Date and
7 Discovery Deadlines dated April 23, 2015, be modified as follows:

8 Non Expert Discovery Cutoff:	October 16, 2015
9 Expert Disclosure:	October 23, 2015
10 Rebuttal Expert Disclosure:	November 13, 2015
11 Expert Discovery Cutoff:	January 15, 2016
12 Non-dispositive Motion Filing Deadline:	January 22, 2016
13 Dispositive Motion Filing Deadline:	February 26, 2016

14 IT IS FURTHER STIPULATED that:

- 15 1. These modified dates do not relate to written discovery; and
- 16 2. All non-expert depositions shall be noticed by no later than August 29, 2015.

17 DATED: August 29, 2015 REICH LAW FIRM

18
19 By /s/ Jeff Reich
Jeff Reich
Attorney for Plaintiff
CELIA RAMIREZ

20
21 DATED: August 20, 2015 LOMBARDI LOPER & CONANT, LLP

22
23 By /s/ B. Clyde Hutchinson
B.Clyde Hutchinson
Attorney for Defendants, NATIONAL
24 RAILROAD PASSENGER CORPORATION
25 aka AMTRAK, BNSF RAILWAY COMPANY and
26 BARBARA ANN NEU

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DATED: August 20, 2015

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

ORDER

The Court, having considered the parties' Stipulation to Continue Discovery Deadlines (ECF No. 37), and good cause appearing, has adjusted the parties' proposed dates and orders the following deadlines to be modified as follows:

- Non Expert Discovery Cutoff: October 16, 2015
- Expert Disclosure: October 23, 2015
- Rebuttal Expert Disclosure: November 13, 2015
- Expert Discovery Cutoff: January 15, 2016
- Non-dispositive Motion Filing Deadline: January 22, 2016
- Dispositive Motion Filing Deadline: February 26, 2016
- Pretrial Conference: May 26, 2016
- Time: 10:00 a.m.
- Courtroom 2
- Trial: July 26, 2016
- Time: 8:30 a.m.
- Courtroom 2

The extension to the non-expert discovery cutoff date is provided solely to complete depositions as required by the parties. Non-expert depositions shall be noticed by no later than August 29, 2015. The Court notes that this Stipulation is the third stipulation to be submitted by the parties that has failed to comport with the guidelines set forth by the Court on November 6, 2014.

1 (ECF No. 31.) The parties are cautioned that the Court will view future requests with similar
2 deficiencies with great disfavor.

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4 IT IS SO ORDERED.

5 Dated: August 25, 2015

/s/ Gary S. Austin
UNITED STATES MAGISTRATE JUDGE

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