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2 **THE REICH LAW FIRM**  
304 BANNER COURT, SUITE 2  
3 MODESTO, CA 95356

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5 Attorneys for Plaintiff

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8 UNITED STATES DISTRICT COURT

9 EASTERN DISTRICT OF CALIFORNIA – FRESNO DIVISION

10  
11 NATIONAL RAILROAD PASSENGER  
CORPORATION,

12  
13 Plaintiff,

14 vs.

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

18 Defendants.

19 CELIA RAMIREZ,

20 Plaintiff,

21 vs.

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

27 Defendants.

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

**STIPULATION TO CONTINUE  
DISCLOSURE OF EXPERT  
DEADLINE and ORDER**

COMPLAINT FILED: September 17, 2013

COMPLAINT FILED: September 18, 2013

1 The parties have met and conferred regarding discovery and mediation in this matter. The  
2 parties are still in the process of finalizing their expert designations and have determined that a one  
3 week extension on the expert disclosure date will allow for additional examination by the experts  
4 before completing their reports. The continuance of the expert disclosure date by one week will  
5 allow this to be accomplished. This extension of time will not affect any other deadlines in the  
6 case. The parties intend to mediate the Ramirez case.

7 IT IS HEREBY STIPULATED by and between the parties hereto, through their respective  
8 attorneys of record that date in the Order on Amended Stipulation to Continue Trial Date and  
9 Discovery Deadlines dated October 6, 2015, be modified only insofar as the Expert Disclosure Date  
10 as follows:

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

22 DATED: October 22, 2015 REICH LAW FIRM

23  
24 By /s/ Shane Reich  
25 Shane Reich  
26 Attorneys for Plaintiff  
27 CELIA RAMIREZ  
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DATED: October 22, 2015

LOMBARDI LOPER & CONANT, LLP

By /s/ Vincent Castillo  
Attorneys for Defendants, NATIONAL  
RAILROAD PASSENGER CORPORATION  
aka AMTRAK, BNSF RAILWAY COMPANY  
and BARBARA ANN NEU

DATED: October 22, 2015

EMERSON · SORENSEN · CHURCH

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

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1 **ORDER**

2 The Court, having considered the parties' Stipulation to Continue Discovery Deadlines, be  
3 modified by changing only the Expert Disclosure as follows:

- 4 Expert Disclosure: October 30, 2015  
5 Rebuttal Expert Disclosure: November 13, 2015  
6 Expert Discovery Cutoff: January 15, 2016  
7 Non-dispositive Motion Filing Deadline: January 22, 2016  
8 Dispositive Motion Filing Deadline: February 26, 2016  
9 Pretrial Conference: May 26, 2016  
10 Time: 10:00 a.m.  
11 Courtroom 2  
12 Trial: July 26, 2016  
13 Time: 8:30 a.m.  
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15 All other orders contained in this Court's Scheduling Order issued on September 5, 2014  
16 (Doc. 28), remain in full force and effect.

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19 IT IS SO ORDERED.

20 Dated: October 26, 2015

/s/ Eric P. Groj  
UNITED STATES MAGISTRATE JUDGE