

1 Jeff Reich—067250
2 Shane Reich—222948
3 **THE REICH LAW FIRM**
4 304 BANNER COURT, SUITE 2
5 MODESTO, CA 95356
6 —
7 209-214-9640

8 Attorneys for Plaintiff

9 UNITED STATES DISTRICT COURT

10 EASTERN DISTRICT OF CALIFORNIA – FRESNO DIVISION

11 NATIONAL RAILROAD PASSENGER
12 CORPORATION,

13 Plaintiff,

14 vs.

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

19 Defendants.

20 CELIA RAMIREZ,

21 Plaintiff,

22 vs.

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

Defendants.

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

**STIPULATION TO CONTINUE
DISCLOSURE OF REBUTTAL EXPERTS
AND EXPERT DISCOVERY
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 have made their initial expert designations with each party designating multiple experts. The
3 parties are attempting to arrange a mediation to occur within the next 30 to 45 days and would like
4 for that to occur before completing expert discovery and finalizing rebuttal expert disclosure.

5 The continuance of the rebuttal expert disclosure, the expert discovery cutoff, and the non-
6 dispositive motion filing deadline allow this to be accomplished. This extension of time will not
7 affect any other deadlines in the case.

8 IT IS HEREBY STIPULATED by and between the parties hereto, through their respective
9 attorneys of record that the dates in the Order on Amended Stipulation to Continue Trial Date and
10 Discovery Deadlines dated October 26, 2015, be modified only insofar as the Rebuttal Expert
11 Disclosure Date, Expert Discovery Cutoff, and Non-dispositive Motion Filing Deadline as follows:

12	Rebuttal Expert Disclosure:	January 4, 2015
13	Expert Discovery Cutoff:	February 5, 2016
14	Non-dispositive Motion Filing Deadline:	February 5, 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: November 10, 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: November 10, 2015

LOMBARDI LOPER & CONANT, LLP

By /s/ B. Clyde Hutchinson
Attorneys for Defendants, NATIONAL
RAILROAD PASSENGER CORPORATION
aka AMTRAK, BNSF RAILWAY COMPANY
and BARBARA ANN NEU

DATED: November 10, 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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ORDER

The Court, having considered the parties' Stipulation to Continue Discovery Deadlines, and good cause appearing therein, orders the scheduling deadlines in this case be modified only insofar as the Rebuttal Expert Disclosure Date, Expert Discovery Cutoff, and Non-dispositive Motion Filing Deadline as follows:

Rebuttal Expert Disclosure:	January 4, 2015
Expert Discovery Cutoff:	February 5, 2016
Non-dispositive Motion Filing Deadline:	February 5, 2016

All other deadlines, including the dispositive motion filing deadline, the pre-trial conference, and the trial date, remain as set forth in the Court's Scheduling Order, issued on September 5, 2014 (ECF No. 28), as amended by the Order on Amended Stipulation to Continue Trial Date and Discovery Deadlines, dated October 26, 2015 (ECF No. 43).

IT IS SO ORDERED.

Dated: November 16, 2015

/s/ Eric P. Groj
UNITED STATES MAGISTRATE JUDGE