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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA – FRESNO DIVISION

NATIONAL RAILROAD PASSENGER CORPORATION,

Plaintiff,

v.

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

Defendants.

Case No. 1:13-CV-01506-DAD-EPG

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

STIPULATION AND ORDER TO EXTEND EXPERT DISCOVERY CUTOFF DEADLINE

AND CONSOLIDATED ACTION.

STIPULATION

The parties in this case, by and through their attorneys of record, hereby stipulate to extend the Expert Discovery Cutoff deadline currently set for February 5, 2016 to March 18, 2016. Good cause exists for the requested extension because the large number of experts does not allow for the scheduling and taking of depositions within the time remaining. The requested extension will not affect any other pre-trial dates previously stipulated to and ordered.

1 Dated: January 25, 2016

THE REICH LAW FIRM

2
3 By: /s/ Jeff Reich
4 **JEFF REICH**
5 Attorneys for Plaintiff CELIA RAMIREZ

6 Dated: January 25, 2016

LOMBARDI, LOPER & CONANT, LLP

7
8 By: /s/ B. Clyde Hutchinson
9 **B. CLYDE HUTHINSON**
10 Attorneys for NATIONAL RAILROAD
11 PASSENGER CORPORATION dba
12 AMTRAK, BNSF RAILWAY
13 COMPANY, and BARBARA ANN NEU

14 Dated: January 25, 2016

EMERSON CHURCH

15 By: /s/ James D. Emerson
16 **JAMES D. EMERSON**
17 Attorneys for YOUNG'S COMMERCIAL
18 TRANSFER, INC. and RIGOBERTO
19 FERNANDEZ JIMENEZ, individually and
20 dba JIMENEZ TRUCKING

21 **ORDER**

22 Pursuant to the parties' stipulation, the Expert Discovery Cutoff deadline currently set for
23 February 5, 2016 is extended until March 18, 2016. This extension shall not affect any other pre-
24 trial dates previously extended on November 17, 2015. (Doc. 44).

IT IS SO ORDERED.

25 Dated: **January 27, 2016**

26 /s/ Eric P. Shoy
27 **UNITED STATES MAGISTRATE JUDGE**

LOMBARDI, LOPER & CONANT, LLP

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1999 Harrison Street, Suite 2600
Oakland, CA 94612-3541

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