

1 BENJAMIN B. WAGNER
United States Attorney
2 ALYSON A. BERG
Assistant United States Attorney
3 2500 Tulare Street, Suite 4401
Fresno, California 93721
4 Telephone: (559) 497-4000
Facsimile: (559) 497-4099
5

6 Attorneys for Defendant PATRICK R. DONAHOE,
POSTMASTER GENERAL, UNITED STATES
7 POSTAL SERVICE

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9 **UNITED STATES DISTRICT COURT**
10 **EASTERN DISTRICT OF CALIFORNIA**

11 FELIPE S. QUINONES,) Case No. 1:13-cv-01553 LJO/GSA
12)
Plaintiff,) STIPULATION TO CONTINUE
13) PRE-TRIAL DATES; ORDER
v.)
14)
PATRICK R. DONAHOE, POSTMASTER)
15)
GENERAL, UNITED STATES POSTAL)
SERVICE,)
16)
Defendant.)
17)

18 Plaintiff Felipe S. Quinones (“Plaintiff”), and Defendant Patrick R. Donahoe, Postmaster
19 General (“Defendant”), (collectively “the parties”), stipulate, by and through the undersigned
20 counsel, to extend the discovery deadlines in this action to allow for the parties to engage in
21 settlement negotiations. The dates for filing motions, the pre-trial conference, and the trial date are
22 not affected by this stipulation.

23 The parties agree to a short extension of the dates to allow the parties to meaningfully
24 participate in a settlement conference set for June 25, 2015 at 10:30 a.m. before the Honorable Gary
25 S. Austin. The parties submit that this request is being made for good cause to allow the parties to
26 attempt to resolve the case at this time, and prior to extensive discovery, depositions and pre-trial
27 disclosures. The stipulation provides a change of approximately two months to the discovery cut-off
28 deadline, without changing the pre-trial conference or trial dates.

1 Accordingly, the parties stipulate and agree to continue the following dates, and base it on the
2 above-stated good cause.

	<u>Old Date</u>	<u>New Date</u>	
3			
4	Settlement Conference	TBA	June 25, 2015 @ 10:30 a.m. Ctrm 10
5			
6	Close of Non-Expert Discovery	July 31, 2015	September 30, 2015
7	Plaintiff's Expert Disclosure	August 24, 2015	October 8, 2015
8	Defendant's Expert Disclosure	September 14, 2015	October 28, 2015
9	Rebuttal Expert Disclosure	September 28, 2015	November 2, 2015
10	Expert Discovery Cut-Off	November 23, 2015	December 1, 2015

11 The parties request the court to endorse this stipulation by way of formal order.

12 Dated: May 21, 2015

Respectfully submitted,
BENJAMIN B. WAGNER
UNITED STATES ATTORNEY

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15 /s/Alyson A. Berg
16 ALYSON A. BERG
17 Attorney for Defendant Patrick R. Donahoe,
Postmaster General, United States Postal Service

18 Dated: May 21, 2015

Church State Council

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20 /s/Alan J. Reinach
21 Alan J. Reinach
Attorneys for Plaintiff

22 ORDER

23 Having reviewed the stipulation submitted by the parties, the dates are continued as
24 referenced above.

25 IT IS SO ORDERED.

26 Dated: May 21, 2015

/s/ Gary S. Austin
27 UNITED STATES MAGISTRATE JUDGE