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POSTMASTER GENERAL, UNITED STATES
7 POSTAL SERVICE

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

10 FELIPE S. QUINONES,) Case No. 1:13-cv-01553-LJO-GSA
11)
Plaintiff,) STIPULATION TO CONTINUE
12) NON-EXPERT DISCOVERY DEADLINE;
v.) ORDER
13)
MEGAN J. BRENNAN, POSTMASTER)
14 GENERAL, UNITED STATES POSTAL) (ECF No. 38)
SERVICE,)
15)
Defendant.)
16)

17 Plaintiff Felipe S. Quinones (“Plaintiff”), and Defendant Megan J. Brennan, Postmaster
18 General (“Defendant”), (collectively “the parties”), stipulate, by and through the undersigned
19 counsel, to extend the non-expert discovery deadline. The dates for filing motions, the pre-trial
20 conference, and the trial date are not affected by this stipulation.

21 The parties agree to a short extension of the date by which to complete non-expert discovery
22 in this case from September 30, 2015 to December 1, 2015, the same day on which expert discovery
23 is to be completed. The parties submit that this request is being made for good cause as the parties
24 attempted to resolve the matter at a settlement conference on August 26, 2015, which attempt was
25 unsuccessful. The parties are seeking to phase discovery to conserve time and resources during this
26 brief extension of the non-expert discovery deadline. Accordingly, the parties stipulate and agree to
27 continue the non-expert discovery deadline, and base it on the above-stated good cause.

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Old Date

New Date

Close of Non-Expert
Discovery

September 30, 2015

December 1, 2015

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

Dated: September 3, 2015

Respectfully submitted,

BENJAMIN B. WAGNER
UNITED STATES ATTORNEY

/s/Alyson A. Berg
ALYSON A. BERG
Attorney for Defendant Megan J. Brennan,
Postmaster General, United States Postal Service

Dated: September 3, 2015

Church State Council

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

ORDER

After a review of the above stipulation and the procedural posture of the case, and good cause appearing therein, the non-expert discovery deadline is continued to December 1, 2015. The Court notes that the non-dispositive motion deadline is currently set for December 14, 2015. Compliance with this deadline and the newly set non-expert discovery deadline will require discovery motions to be filed and heard sufficiently in advance of the specified deadlines so that the Court may grant effective relief within the allotted discovery time. A party's failure to have a discovery dispute heard sufficiently in advance of the discovery cutoff may result in denial of the motion as untimely.

IT IS SO ORDERED.

Dated: September 8, 2015

/s/ Gary S. Austin
UNITED STATES MAGISTRATE JUDGE