

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 MEGAN BRENNAN, POSTMASTER
GENERAL, UNITED STATES POSTAL SERVICE
7

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

10
11 FELIPE S. QUINONES,

12 Plaintiff,

13 v.

14 MEGAN J. BRENNAN, POSTMASTER
GENERAL, UNITED STATES POSTAL
15 SERVICE,

16 Defendant.
17

CASE NO. 1:13-cv-01553-DAD-EPG

**JOINT STIPULATION TO CONTINUE
NON-EXPERT DISCOVERY AND
NON-DISPOSITIVE MOTIONS
DEADLINES; ORDER**

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

23 This action arises from Plaintiff’s challenge to his removal from the position of a part time
24 flexible clerk in the Lindsay Post Office alleging religious discrimination. Defendant disputes
25 Plaintiff’s claims because it would be an undue hardship on the operations of the Lindsay Post Office
26 to allow Plaintiff to have every Saturday off as there is only one other part time clerk to perform
27 those duties on Saturdays.

28 ///

1 After engaging in extensive discovery including exchanging over 19,000 pages of documents
2 and taking fifteen depositions, the parties agree to a short extension of the date by which to complete
3 non-expert discovery in this case from April 11, 2016 to May 9, 2016, and a brief extension of the non-
4 dispositive motions deadline from April 25, 2016 to May 23, 2016. The parties submit that this request
5 is being made for good cause as the parties are scheduled for mediation with Honorable Enrique Romero
6 on April 19, 2016. This brief extension of the discovery and non-dispositive motions deadlines will
7 allow the parties to focus on a resolution before incurring additional fees and costs.

8 In an effort to continue the good faith efforts by the parties to resolve this case and conserve
9 the parties and judicial resources until absolutely necessary, the parties stipulate and agree to continue
10 the following dates, and base it on the above-stated good cause.

	Old Date	New Date	
11			
12	Close of Non Expert Discovery	April 11, 2016	May 9, 2016
13	Non-Dispositive Motions	April 25, 2016	May 23, 2016

14
15 Respectfully submitted,

16 BENJAMIN B. WAGNER
17 UNITED STATES ATTORNEY

18 Dated: April 11, 2016

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

CHURCH STATE COUNCIL

22 Dated: April 11, 2016

(As authorized 04/11/16)
/s/ Alan J. Reinach
23 Alan J. Reinach
24 Jonathon Cherne
25 Attorneys for Plaintiff Felipe S. Quinones

SOTTILE & BALTAHE

26
27 Dated: April 11, 2016

(As authorized 04/11/16)
/s/ Timothy Sottile
28 Timothy Sottile
Attorneys for Plaintiff Felipe S. Quinones

ORDER

Having reviewed the stipulation submitted by the parties, and for good cause showing, the above mentioned dates are continued as follows:

Non-expert discovery cutoff: May 9, 2016

Non-dispositive motion deadline: May 9, 2016

All other deadlines in this case remain as set forth in the Order Adopting the Parties' the Stipulation to Continue Pre-Trial and Trial Dates (ECF No. 52).

IT IS SO ORDERED.

Dated: April 13, 2016

/s/ Eric P. Groj
UNITED STATES MAGISTRATE JUDGE