1 2 3 4 5	Warren R. Paboojian, Calif. Bar No. 128462 Adam B. Stirrup, Calif. Bar No. 257683 BARADAT & PABOOJIAN, INC. 720 W. Alluvial Ave. Fresno, CA 93711 Phone: (559) 431-5366 Fax: (559) 431-1702 Attorneys for: Plaintiff Steven Arizaga		
6 7 8 9 10	Mark D. Sayre, Calif. Bar No. 111168 Henry Turner, Jr. (pro hac) VALOREM LAW GROUP LLP 35 E. Wacker Dr., Ste. 3000 Chicago, IL 60601 Phone: (312) 676-5463 Fax: (312) 676-6499 Attorneys for: Defendant John Bean Techno	logies Corporation	
 11 12 13 14 15 16 	Meena C. Nachiappan, Calif. Bar No. 196701 BRAGG & KULUVA 555 S. Flower Street, Suite 600 Los Angeles, CA 90071 Phone: (213) 612-5335 Fax: (213) 612-5712 Attorney for: Third Party Defendant Ventura Coastal, LLC UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF CALIFORNIA, FRESNO DIVISION		
 17 18 19 20 21 22 23 24 25 26 27 28 	STEVEN ARIZAGA, Plaintiff, vs. JOHN BEAN TECHNOLOGIES CORPORATION, et al., Defendants. JOHN BEAN TECHNOLOGIES CORPORATION, Third-Party Plaintiff, vs. VENTURA COASTAL, LLC, Third-Party Defendants.) No. 13-cv-01981-AWI-MJS Magistrate Judge Michael J. Seng) STIPULATION RE: CONTINUATION OF EXPERT DISCOVERY DEADLINES; PROPOSED ORDER	
	Stipulation Re: Continuation of Discovery Deadlines and Proposed Order – No. 13-cv-01981-MJS		

1			
2	Plaintiff Steven Arizaga, Defendant John Bean Technologies Corporation, and Third-		
2	Party Defendant Ventura Coastal LLC agree and stipulate as follows:		
	1. The parties are currently scheduled to attend mediation with Ret. Justice Nickolas		
4	Dibiaso on January 11, 2016.		
5	2. In light of the pending mediation, the parties have agreed to continue the expert		
6	disclosure deadlines as set forth below, subject to the Court's calendar:		
7	Plaintiff Expert Disclosure Deadline: January 29, 2016		
8	• Defendant Expert Disclosure Deadline: February 26, 2016		
9	Rebuttal Expert Disclosure Deadline: March 4, 2016		
10	3. The parties agree and stipulate that all other pre-trial and trial dates and deadlines		
11	shall remain in place, per the Court's April 8, 2015 October 6, 2015 Orders (Dkt Nos. 37 and 45).		
12	4. By agreement, this stipulation may be executed in counterparts and via		
13	email/facsimile, which when assembled shall be deemed one original document.		
14	[SIGNATURE PAGES TO FOLLOW ON NEXT PAGE]		
15			
16			
17			
18			
19			
20			
21			
22			
23			
24			
25			
26			
27			
28	1		
	Stipulation Re: Continuation of Discovery Deadlines and Proposed Order – No. 13-cv-01981-MJS		

1				
2	IT IS SO STIPULATED.			
3				
4				
5	Dated: December 21, 2015	BARADAT & PABOOJIAN, INC.		
6		<u>/s/ Adam B. Stirrup</u> Warren R. Paboojian, Calif. Bar No. 128462		
7		Adam B. Stirrup, Calif. Bar No. 257683 720 W. Alluvial Ave.		
8		Fresno, CA 93711 Attorneys for: Plaintiff Steven Arizaga		
9	Dated: December 22, 2015	VALOREM LAW GROUP, LLP		
10	Dated. December 22, 2015			
11		<u>/s/ Henry Turner, Jr. (as authorized on 12/22/15)</u> Mark D. Sayre, Calif. Bar No. 111168		
12		Henry Turner, Jr. (pro hac) 35 E. Wacker Dr., Ste. 3000		
13		Chicago, IL 60601 Tele: (312) 676-5463		
14		Fax: (312) 676-5499 Attorneys for: Defendant John Bean Technologies		
15		Corporation		
16	Dated: December 28, 2015	BRAGG & KULUVA		
17		/s/ Meena C. Nachiappan (as authorized on 12/28/15)		
18		Meena C. Nachiappan, Bar No. 196701 555 S. Flower Street, Suite 600		
19 20		Los Angeles, CA 90071 Phone: (213) 612-5335		
20		Fax: (213) 612-5712 Attorneys for: Third Party Defendant Ventura Coastal,		
21		LLC		
23				
24				
25				
26				
27				
28		2		
	Stipulation Re: Continuation of Discovery Deadlines and			
	Proposed Order – No. 13-cv-01981-MJS			

1		
2	ORDER	
3	Pursuant to Plaintiff Steven Arizaga, Defendant John Bean Technologies Corporation, and	
4	Third-Party Defendant Ventura Coastal LLC's Stipulation and for good cause shown, the above	
5	Stipulation is accepted, adopted and made the Order of the Court.	
6	IT IS SO ORDERED.	
7		
8	Dated: <u>January 4, 2016</u> UNITED STATES MAGISTRATE JUDGE	
9		
10		
11		
12		
13		
14		
15		
16		
17		
18		
19 20		
20		
22		
23		
24		
25		
26		
27		
28		