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23 Attorney for: Third Party Defendant Ventura Coastal, LLC

24 **UNITED STATES DISTRICT COURT**
25 **FOR THE EASTERN DISTRICT OF CALIFORNIA, FRESNO DIVISION**

26 STEVEN ARIZAGA,)
27) No. 13-cv-01981-AWI-MJS
28 Plaintiff,) Magistrate Judge Michael J. Seng
29 vs.)
30) **STIPULATION RE: CHANGING**
31 JOHN BEAN TECHNOLOGIES) **DATES OF PRE-TRIAL CONFERENCE**
32 CORPORATION, et al.,) **AND EXPERT DISCLOSURE**
33) **DEADLINES; ORDER**
34 Defendants.)
35)
36 _____)
37 JOHN BEAN TECHNOLOGIES)
38 CORPORATION,)
39)
40 Third-Party Plaintiff,)
41)
42 vs.)
43)
44 VENTURA COASTAL, LLC,)
45)
46 Third-Party Defendants.)

1 Plaintiff Steven Arizaga, Defendant John Bean Technologies Corporation, and Third-
2 Party Defendant Ventura Coastal LLC agree and stipulate as follows:

3 1. Counsel for Defendant John Bean Technologies Corporation did not realize that
4 the Pre-Trial Conference in this case, currently scheduled for March 25, 2016, fell on Good
5 Friday. Lead trial counsel for Defendant John Bean Technologies Corporation is committed to
6 take part in Good Friday services at his local parish on March 25, 2016.

7 2. In light of the conflict for trial counsel for Defendant John Bean Technologies
8 Corporation, the parties have agreed and stipulated to move the Pre-Trial Conference from March
9 25, 2016 to **March 24, 2016 at 11:00 a.m.**, subject to the Court's availability.

10 3. Due to conflicts with counsel's and witness' availability and to allow for the
11 parties to take part in a February 1, 2016 mediation, the parties agreed to move the 30(b)(6)
12 deposition of Third-Party Defendant Ventura Coastal LLC to February 26, 2016. The expected
13 testimony of Ventura Coastal's 30(b)(6) witness(es) will impact the parties' expert disclosures.
14 The parties have thus agreed and stipulated to move the deadlines for expert disclosures as
15 follows:

- 16 a. Plaintiff Expert Disclosure Deadline: **March 16, 2016**
- 17 b. Defendant Expert Disclosure Deadline: **April 1, 2016**
- 18 c. Rebuttal Expert Disclosure Deadline: **April 6, 2016**

19 4. The parties agree and stipulate that all other pre-trial and trial dates and deadlines
20 shall remain in place under the Court's prior Orders.

21 5. By agreement, this stipulation may be executed in counterparts and via
22 email/facsimile, which when assembled shall be deemed one original document.

23 **[SIGNATURE PAGES TO FOLLOW ON NEXT PAGE]**

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IT IS SO STIPULATED.

Dated: February 12, 2016

BARADAT & PABOOJIAN, INC.

/s/ Adam B. Stirrup (as authorized on February 12, 2016)

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Attorneys for: Plaintiff Steven Arizaga

Dated: February 16, 2016

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/s/ Henry Turner, Jr.

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Dated: February 16, 2016

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/s/ Meena C. Nachiappan (as authorized on February 16, 2016)

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ORDER

Pursuant to the Parties collective **STIPULATION RE: CHANGING DATES OF PRE-TRIAL CONFERENCE AND EXPERT DISCLOSURE DEADLINES** in Case No. 13-cv-01981-AWI-MJS and for good cause shown, the Stipulation is accepted, adopted and made the Order of the Court.

IT IS SO ORDERED.

Dated: February 22, 2016

/s/ Michael J. Seng
UNITED STATES MAGISTRATE JUDGE

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PROOF OF SERVICE

I am a citizen of the United States and a resident of the State of Illinois. I am employed in Cook County, State of Illinois, in the office of a member of the bar of this Court, at whose direction this service is made. I am over the age of 18, and not a party to the within action. My business address is 35 East Wacker Drive, Suite 3000, Chicago, Illinois 60601.

On February 18, 2016, I served a true and correct copy of the following document(s) described as:

- 1. STIPULATION RE: CHANGING DATES OF PRE-TRIAL CONFERENCE AND EXPERT DISCLOSURE DEADLINES;**
- 2. PROPOSED ORDER; and**
- 3. PROOF OF SERVICE**

on the following parties:

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Attorneys for Third-Party Defendant Ventura Coastal, LLC

in the following manner:

To be served upon all counsel of record via the Court’s ECF system.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on February 18, 2016, at Chicago, Illinois.

Molly Wade