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23 Attorneys for: Defendant John Bean Technologies Corporation

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

26 STEVEN ARIZAGA, )  
27 )  
28 Plaintiff, ) No. 1:13-CV-01981-MJS  
29 vs. ) Magistrate Judge Michael J. Seng

30 JOHN BEAN TECHNOLOGIES ) **STIPULATION RE: CONTINUANCE**  
31 CORPORATION, et al., ) **OF TRIAL DATE AND PRE-TRIAL**  
32 ) **CONFERENCE;**

33 Defendants. ) **ORDER THEREON**

34 \_\_\_\_\_ )  
35 JOHN BEAN TECHNOLOGIES )  
36 CORPORATION, )  
37 )  
38 Third-Party Plaintiff, )

39 vs. )

40 VENTURA COASTAL, LLC, )  
41 )  
42 Third-Party Defendants. )

1 Plaintiff Steven Arizaga and Defendant John Bean Technologies Corporation agree and  
2 stipulate as follows:

3 1. Due to the complexity of the issues for trial and new information learned at the end  
4 of the current discovery period, including information learned during the 30(b)(6) deposition of  
5 third party Ventura Coastal after the close of fact discovery, counsel for Plaintiff Steven Arizaga  
6 and Defendant John Bean Technologies Corporation need additional time to prepare for trial.

7 2. Other than additional fact discovery that may be needed due to information learned  
8 during the 30(b)(6) deposition of third party Ventura Coastal, fact discovery is based off the old  
9 trial date and is closed.

10 3. Counsel for Plaintiff Steven Arizaga and Defendant John Bean Technologies  
11 Corporation thus have agreed and stipulated to move the trial date and pre-trial conference as  
12 follows, subject to the Court's calendar:

- 13 a. Plaintiff's Expert Disclosure Deadline: **June 17, 2016**
- 14 b. Defendants' Expert Disclosure Deadline: **July 8, 2016**
- 15 c. Rebuttal Expert Disclosure Deadline: **July 22, 2016**
- 16 d. Close of expert discovery: **July 26, 2016**
- 17 e. Joint pre-trial statement: **July 29, 2016**
- 18 f. Pre-trial Conference: **August 11, 2016 at 11:00 a.m.**
- 19 g. Trial Date: **September 27, 2016 at 8:30 a.m.**

20 4. The parties met and conferred via phone and e-mail on March 22-24, 2016 and  
21 agree that a scheduling conference before the Court is not necessary at this time.

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

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

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IT IS SO STIPULATED.

Dated: March 25, 2016

BARADAT & PABOOJIAN, INC.

/s/ Adam B. Stirrup

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Adam B. Stirrup, Calif. Bar No. 257683

720 W. Alluvial Ave.

Fresno, CA 93711

Attorneys for: Plaintiff Steven Arizaga

Dated: March 24, 2016

VALOREM LAW GROUP, LLP

/s/ Henry Turner, Jr. (as authorized on March 24, 2016

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**ORDER**

Pursuant to Stipulation by Plaintiff Steven Arizaga and Defendant John Bean Technologies Corporation, and for good cause shown, the above Stipulation is accepted, adopted and made the Order of the Court.

IT IS SO ORDERED.

Dated: March 30, 2016

/s/ Michael J. Seng  
UNITED STATES MAGISTRATE JUDGE