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

10 RICHARD CLYMORE, an individual; DEBRA) Case No. 1:14-cv-00101 AWI/SMS
HARBIN-CLYMORE, an individual,)
11)
Plaintiffs,)
12)
v.) **STIPULATION EXTENDING**
13) **SCHUDULING DEADLINES;**
FEDERAL RAILROAD ADMINISTRATION,) **ORDER**
14 a Federal Public Entity; CHARLES MARK)
HAGOOD, an individual; and DOES 1 through)
15 10, Inclusive,)
16 Defendants.)
17

18 Plaintiffs, Richard Clymore and Debra Harbin-Clymore (“Plaintiffs”), and Defendant United
19 States (“Defendant”), by and through their undersigned counsel, jointly stipulate by and through the
20 undersigned counsel, to continue the following deadlines in this action as more specifically set forth
21 below.

22 The parties base this stipulation on good cause as the parties have agreed to participate in a
23 mediation to resolve the matter. The parties anticipate the mediation be held the first part of October,
24 2015. However, if the mediation is unsuccessful, the parties require this brief extension of
25 approximately six weeks, to complete discovery in the case. Due to the number of depositions to be
26 taken as well as the location of those depositions, the non-expert discovery date currently set cannot
27 be met. The parties agree to extend certain scheduling deadlines without affecting the pre-trial
28 conference or trial date in this action.

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	Old Date	New Date
Non-Expert Discovery Cutoff:	September 18, 2015	October 30, 2015
Expert Disclosure:	October 9, 2015	November 20, 2015
Supplemental Expert Disclosures:	November 6, 2015	December 18, 2015
Expert Discovery Cut-Off:	February 19, 2016	April 1, 2016
Non-dispositive Motion Filing:	October 23, 2015	December 4, 2015
Dispositive Motion Filing:	February 26, 2016	April 8, 2016

For the reasons set forth herein, the parties therefore stipulate and agree to extend the foregoing deadlines as specified above. The parties request the court endorse this stipulation by way of formal order.

Respectfully submitted,

Dated: August 13, 2015

BENJAMIN B. WAGNER
United States Attorney

By: /s/Jeffrey J. Lodge
JEFFREY J. LODGE
Assistant U.S. Attorney
Attorneys for the United States

Dated: August 14, 2015

PANISH SHEA & BOYLE LLP

(As authorized 08/14/15)
By: /s/David Rudorder
DAVID RUDORFER
Attorneys for Plaintiffs

ORDER

For good cause showing, IT IS HEREBY ORDERED that the deadlines in this matter are ordered as outlined above.

IT IS SO ORDERED.

Dated: August 20, 2015

/s/ Sandra M. Snyder
UNITED STATES MAGISTRATE JUDGE

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