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12 SCHLUMBERGER TECHNOLOGY CORP.

13 UNITED STATES DISTRICT COURT
14 EASTERN DISTRICT OF CALIFORNIA
15

16 KENNETH LAWRENCE,
17 Plaintiff,
18 v.
19 SCHLUMBERGER TECHNOLOGY
20 CORPORATION, a Texas corporation;
and DOES 1-20 inclusive,
21 Defendants.
22

Case No. 1:14-cv-00524 JLT

**JOINT STIPULATION AND
[PROPOSED] ORDER TO
CONTINUE DISCOVERY AND
TRIAL DATE**

(Doc. 19)

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25 Pursuant to Local Rules 143 and 144, Plaintiff Kenneth Lawrence
26 (“Plaintiff”) and Defendant Schlumberger Technology Corporation (“Defendant”),
27 by and through their attorneys of record, submit this joint stipulation:
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1 WHEREAS, on March 31, 2015, the Court granted the request of counsel to
2 extend the discovery pertaining to non-experts to June 10, 2015 , and expert
3 discovery to August 26, 2015;

4 WHEREAS, Plaintiff noticed a 30(b)(6) deposition out of state for which
5 Defendant requires additional time to identify the Person Most Knowledgeable as to
6 the specific topics, which are focused on a particular time frame, and thereafter for
7 the parties to identify mutually agreeable dates for the deposition;

8 WHEREAS, the Parties are in the process of meeting and conferring about
9 supplemental responses to interrogatories served on Defendant on February 24,
10 2015, and Defendant intends to provide supplemental responses to interrogatories on
11 or before May 18, 2015 so the Parties can resolve any disputes informally;

12 WHEREAS, to avoid unnecessarily expending the parties' and judicial
13 resources, the Parties to seek to push back the deadline by which Defendant must
14 file a motion for summary judgment and for which the motion must be heard;

15 WHEREAS, the extension will permit the Parties time to conduct this
16 additional discovery and thereafter evaluate the prospects for settlement and
17 potentially schedule a settlement conference with a Magistrate Judge;

18 THEREFORE, IT IS STIPULATED by the parties and respectfully requested
19 that the Court make the following changes to the Court's calendar:

20 1. Non-expert discovery cut-off shall be continued from June 10, 2015 to
21 July 17, 2015;

22 2. The Parties shall disclose all expert witnesses, in writing, on or before
23 August 17, 2015 and to disclose all rebuttal experts on or before September 14,
24 2015;

25 3. Expert discovery cut-off shall be continued from August 26, 2015 to
26 October 12, 2015;

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- 4. Dispositive motions SHALL be filed no later than July 28, 2015 and heard no later than September 1, 2015;
- 5. The pretrial conference is CONTINUED to November 23, 2015 at 10:00 a.m.;
- 6. The trial is CONTINUED to January 11, 2016 at 8:30 a.m.

IT IS SO ORDERED.

Dated: May 12, 2015

/s/ Jennifer L. Thurston
UNITED STATES MAGISTRATE JUDGE