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11 12	Attorneys for Defendant SCHLUMBERGER TECHNOLOGY CORP.				
13					
14	UNITED STATES DISTRICT COURT				
15	EASTERN DISTRICT OF CALIFORNIA				
16	WEND TETRILL A MADEN CE	L C N 111 00524 W.T.			
17	KENNETH LAWRENCE,	Case No. 1:14-cv-00524 JLT			
18	Plaintiff,	JOINT STIPULATION AND [PROPOSED] ORDER TO CONTINUE DISCOVERY AND			
19	V.	TRIAL DATE			
20	SCHLUMBERGER TECHNOLOGY CORPORATION, a Texas corporation; and DOES 1-20 inclusive,	(Doc. 19)			
21	Defendants.				
22	Defendants.				
23					
24					
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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STIPULATION RE: CONT. DISC. AND TRIAL DATE

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WHEREAS, on March 31, 2015, the Court granted the request of counsel to extend the discovery pertaining to non-experts to June 10, 2015, and expert discovery to August 26, 2015;

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

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

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

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

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

- 1. Non-expert discovery cut-off shall be continued from June 10, 2015 to July 17, 2015;
- 2. The Parties shall disclose all expert witnesses, in writing, on or before August 17, 2015 and to disclose all rebuttal experts on or before September 14, 2015:
- 3. Expert discovery cut-off shall be continued from August 26, 2015 to October 12, 2015;

1	2.	2. The deadline for Parties to bring dispositive motions shall be continued				
2	from May 19, 2015 to July 28, 2015;					
3	3.	The deadline for dispositive motions to be heard shall be continued				
4	from June	from June 30, 2015 to September 8, 2015;				
5	4.	The trial shall be continued from September 21, 2015 to November 16,				
6	2015;					
7	IT IS SO STIPULATED,					
8	Dated:	May 11, 2015	MORGAN, LEWIS & BOCKIUS LLP			
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10			By/s/ Patricia Riordan			
11			Jason Mills Patricia Riordan			
12			Attorneys for Defendant SCHLUMBERGER			
13			TECHNOLOGY CORPORATION			
14	Dated:	May 11, 2015	LAW OFFICE OF KENNETH F. MOSS			
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16			By /s/ Kenneth Moss			
17			Kenneth F. Moss Attorneys for Plaintiff KENNETH LAWRENCE			
18			KENNÉTH LAWRENCE			
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20	ORDER					
21	Based upon the foregoing, the Court ORDERS the case schedule amended as follows:					
22	1. All non-expert discovery SHALL be completed no later than July 17, 2015 and all					
23	expert discovery SHALL be completed no later than October 12, 2015;					
24	2.	The Parties SHALL disc	close all expert witnesses, in writing, no later than August			
25	17, 2015 and disclose all rebuttal experts no later than September 14, 2015;					
26	3.	Nondispositive motions	SHALL be filed no later than October 19, 2015 and heard			
27	no later than November 20, 2015;					
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			STIPLILATION RECONT DISC AND TRIAL DATE			

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1	4.	Dispositive motions SH	ALL be filed no later than July 28, 2015 and heard no later	
2	than September 1, 2015;			
3	5.	The pretrial conference is CONTINUED to November 23, 2015 at 10:00 a.m.;		
4	6.	The trial is CONTINUE	ED to January 11, 2016 at 8:30 a.m.	
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6	IT IS SO OI	RDERED.		
7	Dated:	May 12, 2015	<u>/s/ Jennifer L. Thurston</u> UNITED STATES MAGISTRATE JUDGE	
8			CIVILD STATES WAGISTRATE JUDGE	
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