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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
FRESNO**

13 SANDRA SANCHEZ,

14 Plaintiff,

15 v.

16 TARGET CORPORATION,

17 Defendant.

Case No. 1:14-cv-00761-SKO

**STIPULATION AND ORDER TO
CONTINUE DEADLINES**

18
19 Pursuant to Civ. L.R. 144, and subject to approval of the Court, Plaintiff Sandra Sanchez
20 (“Plaintiff”) and Defendant Target Corporation (“Target”), by and through their attorneys enter
21 into the following stipulation and respectfully request the Court’s acceptance of this stipulation:

22 WHEREAS, on August 27, 2014 the Court issued a Scheduling Order (“Scheduling
23 Order”) in the above referenced action;

24 WHEREAS, pursuant to the Scheduling Order, the deadline for Non Expert Discovery is
25 April 17, 2015, the deadline for Expert Disclosure is May 1, 2015, the deadline for Supplemental
26 Expert Disclosure is May 15, 2015, and the deadline for Expert Discovery is June 10, 2015;

1 WHEREAS, pursuant to the Scheduling Order, the deadline to file dispositive motions is
2 June 12, 2015, and the deadline for hearing on dispositive motions is July 15, 2015;

3 WHEREAS, pursuant to the Scheduling Order, the Settlement Conference is set for April
4 27, 2015, the Pretrial Conference is set for August 19, 2015, and Trial is set for September 29,
5 2015;

6 WHEREAS, the parties have informally engaged in settlement discussions for the last
7 three months, during which time the parties conducted informal discovery to conserve resources
8 while attempting to settle this matter;

9 WHEREAS, it has taken the parties more time than expected to mutually agree on a
10 mediator and to schedule a mediation date;

11 WHEREAS, the parties have a mediation set for April 15, 2015 with Buzz Wiesenfeld of
12 Judicate West;

13 WHEREAS, the parties agree that they would like to avoid the expense of time and
14 resources associated with further discovery in this matter while they engage in settlement
15 discussions and attend mediation. The parties believe that a continuance of the current trial date
16 and all related scheduled dates will promote judicial economy in that the parties will be able to
17 delay incurring further litigation expenses until after the mediation;

18 WHEREAS, the parties have met and conferred regarding continuing the dates set forth
19 in the Court's August 27th scheduling order;

20 WHEREAS, Defendant is unavailable in December 2015 and counsel for Plaintiff is
21 unavailable in January and February 2016 due to trials in other cases;

22 WHEREAS, the parties respectfully request that the Court vacate the current trial date
23 and pretrial deadlines and reschedule all associated dates and deadlines by approximately 160
24 days at times convenient for the Court and counsel. This additional time will allow the parties to
25 continue engaging in settlement discussions, and complete discovery before the dispositive
26 motion deadline, assuming mediation is unsuccessful;

1 WHEREAS, the Parties have not requested any prior extension in this matter.

2 NOW, THEREFORE, the Parties agree and stipulate, subject to the approval of the
3 Court, that:

4 1. The April 17, 2015 deadline for Non-Expert Discovery be continued to on or after
5 September 24, 2015;

6 2. The May 1, 2015 deadline for Expert Disclosure be continued to on or after
7 October 8, 2015;

8 3. The May 15, 2015 deadline for Supplemental Expert Disclosure be continued to
9 on or after October 22, 2015;

10 4. The June 10, 2015 deadline for Expert Discovery be continued to on or after
11 November 17, 2015;

12 5. The June 12, 2015 deadline to file dispositive motions be continued to on or after
13 November 19, 2015 and the deadline for hearing on dispositive motions to be continued to
14 February 22, 2016;

15 6. The April 27, 2015 Settlement Conference be continued to on or after October 5,
16 2015, and the August 19, 2015 Pretrial Conference be continued to on or after January 26, 2016;
17 and

18 7. The September 29, 2015 Trial date be continued to on or after March 7, 2016;

19 **IT IS SO STIPULATED**

20
21 DATED: March 17, 2015

SEYFARTH SHAW LLP

22 By: /s/ Courtney K. Bohl

23 Courtney K. Bohl
24 Attorneys for Defendant
25 TARGET CORPORATION
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1 DATED: March 16, 2015

LAW OFFICE OF DEAN B. GORDON

2 By: /s/ Dean B. Gordon

3 Dean B. Gordon

4 Attorney for Plaintiff SANDRA SANCHEZ

5 **ORDER**

6 Pursuant to the parties' stipulation, the case deadlines are modified as follows:

7 <u>Event</u>	8 <u>Current Date</u>	9 <u>Modified Date</u>¹
10 Non-Expert Discovery	April 17, 2015	September 24, 2015
11 Expert Disclosure	May 1, 2015	October 8, 2015
12 Suppl. Expert Disclosure	May 15, 2015	October 22, 2015
13 Expert Discovery	June 10, 2015	November 17, 2015
14 Motion Filing Deadline	June 12, 2015	November 18, 2015
15 Motion Hearing Deadline	July 25, 2015	December 16, 2015
16 Settlement Conference	April 27, 2015	October 27, 2015 at 10:30 a.m. in Courtroom 9
17 Pre-trial Conference	August 19, 2015	January 27, 2016
18 Trial	September 29, 2015	March 8, 2016

19 IT IS SO ORDERED.

20 Dated: March 19, 2015

21 /s/ Sheila K. Oberto
22 UNITED STATES MAGISTRATE JUDGE

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27 ¹ In light of the parties' requested trial date of March 7, 2016, the parties' requested February 22, 2016, deadline for
28 hearing all motions could not be accommodated. The dates for motion hearings, settlement conference, pre-trial
conference, and trial have been adjusted by a few days to comport with the Court's calendar.