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11 DEFENDER SECURITY COMPANY

12 **UNITED STATES DISTRICT COURT**

13 **EASTERN DISTRICT OF CALIFORNIA**

15 JOSE GADDIS, an individual,

Case No. 1:14-cv-01206-TLN-MJS

16 Plaintiff,

**STIPULATION AND ORDER
EXTENDING DISCOVERY DEADLINES**

17 vs.

18 DEFENDER SECURITY COMPANY, a
19 Nevada corporation; and DOES 1 through 25,
inclusive,

Action Filed: June 24, 2014

20 Defendant.

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Case No. 1:14-cv-01206-TLN-MJS

STIPULATION AND ORDER EXTENDING DISCOVERY DEADLINES

STIPULATION

IT IS HEREBY STIPULATED AND AGREED by and between plaintiff Jose Gaddis, his attorneys of records (“Plaintiff”), and Defendant Defender Security Company, by its attorneys of record (“Defendant”), that the following Stipulation may be entered as an Order by the Court to give effect to the stipulations set forth below:

WHEREAS, on June 24, 2014, Plaintiff filed his civil complaint in Fresno County Superior Court (“Complaint”). Thereafter, on July 29, 2014, Defendant answered the Complaint. On July 31, 2014, Defendant removed the case the United States District Court for the Eastern District of California.

WHEREAS, on September 30, 2014, Plaintiff and Defendant filed a joint status report wherein the parties indicated they were agreeable to participating in court-sponsored mediation through the Court's Voluntary Dispute Resolution Program (Docket No. 14);

WHEREAS on November 25, 2014, the Court issued its Pretrial Scheduling Order in which it referred the case to the Voluntary Dispute Resolution Program. The Court also ordered the parties to complete all non-expert discovery by May 18, 2015 and expert discovery by July 9, 2015 (Docket No. 17);

WHEREAS, in anticipation of participating in early court-sponsored mediation, and to avoid incurring potentially unnecessary litigation fees, the parties agreed to delay discovery until after mediation with the exception of some exchange of written discovery necessary to facilitate the mediation process;

WHEREAS, on March 24, 2015, the Court's Sacramento Division contacted the parties to arrange mediation pursuant to the Court's referral;

WHEREAS, on April 8, 2015, the Court appointed Timothy Long of Orrick Herrington as neutral for the court-sponsored mediation (Docket No. 26);

WHEREAS, the parties would like to complete mediation on a mutually convenient date to Mr. Long in June 2015;

WHEREAS the parties would like to defer discovery until after mediation so they can focus on resolving the case and avoid potentially unnecessary litigation fees;

1 WHEREAS the parties will need additional time to complete discovery should mediation
2 prove unsuccessful;

3 THEREFORE, the parties request that the non-expert and expert discovery deadlines be
4 extended to September 4, 2015 and October 30, 2015, respectively.

5 **IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.**

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7 DATED: April 14, 2015

LAW OFFICE OF AMY R. LOVEGREN-
TIPTON, APLC

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10 By: /s/ Amy R. Lovegren-Tipton
11 AMY R. LOVEGREN-TIPTON
12 Attorneys for Plaintiff
JOSE GADDIS

13 DATED: April 14, 2015

14 OGLETREE, DEAKINS, NASH, SMOAK &
15 STEWART, P.C.

16 By: /s/ Becki D. Graham
17 GREGORY C. CHENG
18 BECKI D. GRAHAM
19 Attorneys for Defendant
DEFENDER SECURITY COMPANY

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ORDER

GOOD CAUSE APPEARING THEREFORE, IT IS HEREBY ORDERED that the

non-expert discovery deadline be extended from May 8, 2015 to September 4, 2015, and the expert

discovery deadline be extended from July 9, 2015 to October 30, 2015.

IT IS SO ORDERED.

Dated: April 15, 2015


Troy L. Nunley
United States District Judge