Kari L. Ley, Cal. Bar No. 142899 The Law Offices of Kari L. Ley 264 Clovis Avenue, Suite 208 Clovis, California 93612 2 Telephone (559) 324-6545 3 Facsimile (559)324-6548 Attorney for Plaintiff 4 THOMAS M. GREENE 5 6 UNITED STATES DISTRICT COURT 7 EASTERN DISTRICT OF CALIFORNIA - SACRAMENTO DIVISION 8 9 Case No. 1:14-CV-01539-KJM/MJS THOMAS M. GREENE, 10 Plaintiff, 11 STIPULATION TO EXTEND EXPERT DESIGNATION AND EXPERT 12 VS. DISCOVERY DATES, AND ORDER 13 THE WINE GROUP, INC., California Corporation dba 14 Franzia Winery; UNITED FOOD AND 15 COMMERCIAL WORKERS UNION LOCAL) 8 - GOLDEN STATE a California 16 Corporation; and DOES 1-75 inclusive, 17 Defendants. 18 19 Whereas, the parties have completed non expert discovery; 20 and 21 Whereas, Plaintiff and Defendant UNITED FOOD AND COMMERCIAL 22 WORKERS UNION LOCAL 8 - GOLDEN STATE ("UNION") have agreed to 23 resolution of their disputes and are in the process of preparing 24 the necessary documentation; and 25 Whereas, Plaintiff and the remaining Defendant THE WINE 26 GROUP, INC., are currently involved in settlement discussions 27

including possible mediation; and

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Whereas, the parties wish to move back the dates for the exchanging expert witness information and completion of expert witness discovery to allow them to finalize the documentation resolving the disputes between Plaintiff and the UNION, and to complete settlement discussions between Plaintiff and THE WINE GROUP, INC.;

The parties through their counsel herby agree and stipulate as follows:

- 1. The deadline for the initial designation of experts shall be moved back from October 6, 2015, to November 3, 2015;
- 2. The deadline for supplementing expert designations shall be moved back from October 22, 2015, to November 19, 2015; and
- 3. The deadline to complete expert witness discovery shall be moved back from November 4, 2015, to December 2, 2015.

Dated: October 2, 2015

The Law Office of Kari L. Ley

/s/ Kari L. Ley

Kari L. Ley, Attorney for Plaintiff THOMAS M. GREENE

Dated: October 2, 2015

Jackson Lewis PC

/s/ Keahn N. Morris

Keahn N. Morris, Attorneys for Defendant The Wine Group, Inc.

Davis, Cowell & Bowe, LLP Dated: October 2, 2015 /s/ David L. Barber David L. Barber, Attorneys for Defendant United Food And Commercial Workers Union Local 8-Golden State **ORDER** Good cause appearing, the STIPULATION TO EXTEND EXPERT DESIGNATION AND EXPERT DISCOVERY DATES in Case No. 1:14-CV-01539-KJM/MJS is approved and made the Order of the Court. All other dates remain as previously ordered. IT IS SO ORDERED. 1st Michael J. Seng Dated: October 5, 2015