

1 RICHARD G. ZIMMER, ESQ. – SBN 107263  
T. MARK SMITH, ESQ. – SBN 162370  
2 CLIFFORD & BROWN  
A Professional Corporation  
3 Attorneys at Law  
Bank of America Building  
4 1430 Truxtun Avenue, Suite 900  
Bakersfield, CA 93301-5230  
5 Tel: (661) 322-6023 Fax: (661) 322-3508

6 Attorneys for Defendant, AUBREY WIMBERLY

7  
8 IN THE UNITED STATES DISTRICT COURT  
9 FOR THE EASTERN DISTRICT OF CALIFORNIA

10 \* \* \*

11 DANNY BROWN, an individual,

12 Plaintiff,

14 vs.

15 AUBREY WIMBERLY, an individual; and  
16 DOES 1 through 100,

17 Defendants.

**CASE NO. 1:14-CV-01812-JLT**

**STIPULATION TO CONTINUE NON-  
EXPERT DISCOVERY COMPLETION  
DATE; ORDER THEREON**

(Doc. 34)

18  
19  
20 COMES NOW, the parties to the above-captioned matter, and hereby submit the following  
21 Stipulation to Continue the Non-Expert Discovery Completion Date;

22 WHEREAS, discovery is ongoing including written and deposition discovery;

23 WHEREAS, additional depositions are noticed and the parties contemplate the need for  
24 additional discovery extending beyond the currently set non-expert discovery completion date of July  
25 1, 2016 per the Scheduling Order;

26 WHEREAS, the parties agree to stipulate that in order for the necessary discovery to be  
27 completed, the Scheduling Order shall be modified to extend the non-expert discovery completion  
28 date to and including August 30, 2016;

1 WHEREAS, the parties agree that this stipulation shall have no bearing on, and is without  
2 prejudice to, any positions taken with regard to Plaintiff's pending motion for leave to modify the  
3 scheduling order to file a first amended complaint;

4 IT IS HEREBY STIPULATED by the parties, through their respective counsel of record, that  
5 the Scheduling Order shall be modified to extend the Non-Expert Discovery Completion Date from  
6 July 1, 2016 to and including August 30, 2016.

7 Dated: June 14, 2016

CLIFFORD & BROWN

8  
9 By:

10 \_\_\_\_\_  
11 RICHARD G. ZIMMER, ESQ.  
T. MARK SMITH, ESQ.  
Attorneys for Defendant,  
AUBREY WIMBERLY

12 Dated: June 13, 2016

LAW OFFICES OF RANDY RUMPH

13  
14 By /s/ \_\_\_\_\_

15 RANDALL MARTIN RUMPH, ESQ.  
16 Attorney for Plaintiff,  
DANNY BROWN  
17 (Authorized in writing June 13, 2016)

18 **ORDER**

19 Based upon the stipulation of the parties (Doc. 34), the case schedule is amended to extend the  
20 non-expert discovery to August 30, 2016. **No other amendments to the case schedule are authorized**  
21 **and no further amendments to the case schedule are contemplated.**

22  
23 IT IS SO ORDERED.

24 Dated: **June 14, 2016**

25 **/s/ Jennifer L. Thurston**  
26 UNITED STATES MAGISTRATE JUDGE