1	Tanya E. Moore, SBN 206683 MISSION LAW FIRM, A.P.C.				
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3	Telephone: (408) 298-2000 Facsimile: (408) 298-6046				
4	Email: service@mission.legal				
5	Attorney for Plaintiff, Mark Hauseur				
6	Trank Tradeout				
7					
8	UNITED STATES DISTRICT COURT				
9	EASTERN DISTRICT OF CALIFORNIA				
10					
11	MARK HAUSEUR,) No. 1:14-cv-01987-DAD-EPG			
12	Plaintiff,)) STIPULATION TO AMEND			
13	VS.) SCHEDULING ORDER; ORDER			
14	NATALIE CLARK, et al.,))			
15	Defendants.))			
16	Defendants.))			
17	Plaintiff, Mark Hauseur ("Plaintiff")), and Defendants, Natalie Clark, Marlene			
18	Robicheaux-Smith, and Antoneya Graves ("I	Defendants," and together with Plaintiff, "the			
19	Parties"), together request that the Court amend	the Scheduling Order as follows:			
20	WHEREAS, attorney Tanya Moore of the Mission Law Firm, A.P.C., was appointed				
21	pro bono counsel for Plaintiff on April 4, 2017 (Dkt. 61);				
22	WHEREAS, a telephonic Discovery Status Conference is set for August 7, 2017 in this				
23	matter;				
24	WHEREAS, Plaintiff's counsel has req	uired time to review the voluminous documents			
25	in the case, and meeting and communicating with Plaintiff has taken Plaintiff's counsel				
26	significant time due to Plaintiff's incarceration, such that Plaintiff will be unable to conduct the				
27	necessary discovery in time to comply with the current deadlines set by this Court's				
28	Scheduling Order, dated March 10, 2017 (Dkt.	54);			

COUNSEL, HEREBY STIPULATE AND AGREE to amend the Scheduling Order as follows: Event Current Date New Date	1	NOW, THEREFORE	, THE PARTIES, THRO	OUGH THEIR RESPECTIVE	
September 29, 2017 November 10, 2017	2	COUNSEL, HEREBY STIP	ULATE AND AGREE to	amend the Scheduling Order as	
Non-expert discovery cutoff Expert discovery October 31, 2017 December 12, 2017 Rebuttal expert disclosures November 30, 2017 January 11, 2018 Dispositive motion filing deadline The Parties additionally stipulate to continue the Discovery Status Conference set for August 7, 2017, to a date on or around October 16, 2017 at the Court's convenience. All other requirements set forth in the Scheduling Order relating to the above shall remain unchanged, including the pre-trial and trial dates. IT IS SO STIPULATED. Dated: July 13, 2017 MISSION LAW FIRM, A.P.C. **STanya E. Moore** Tanya E. Moore** Tanya E. Moore** Attorney for Plaintiff, Mark Hauseur Dated: July 13, 2017 LeBEAU – THELEN, LLP **SThomas P. Feher** Thomas P. Feher** Thomas P. Feher** Attorneys for Defendant, Natalie Clark Dated: July 13, 2017 RIVERA & ASSOCIATES **S Jonathan B. Paul**	3	follows:			
Expert discovery cutoff Expert discovery cutoff Expert discovery cutoff Expert disclosures October 31, 2017 December 12, 2017 Rebuttal expert disclosures November 30, 2017 January 11, 2018 Dispositive motion filing The Parties additionally stipulate to continue the Discovery Status Conference set for August 7, 2017, to a date on or around October 16, 2017 at the Court's convenience. All other requirements set forth in the Scheduling Order relating to the above shall remain unchanged, including the pre-trial and trial dates. IT IS SO STIPULATED. Dated: July 13, 2017 MISSION LAW FIRM, A.P.C. /// Tanya E. Moore Tanya E. Moore Attorney for Plaintiff, Mark Hauseur Dated: July 13, 2017 LeBEAU – THELEN, LLP /// Thomas P. Feher Thomas P. Feher Attorneys for Defendant, Natalie Clark Dated: July 13, 2017 RIVERA & ASSOCIATES /// Jonathan B. Paul Jonathan B. Paul Attorneys for Defendant,	4	<u>Event</u>	Current Date	New Date	
Expert disclosures	5	Non-expert discovery cutoff	September 29, 2017	November 10, 2017	
Rebuttal expert disclosures November 30, 2017 January 11, 2018 Bebuttal expert disclosures November 30, 2017 January 11, 2018 Dispositive motion filing February 28, 2018 April 11, 2018 deadline The Parties additionally stipulate to continue the Discovery Status Conference set for August 7, 2017, to a date on or around October 16, 2017 at the Court's convenience. All other requirements set forth in the Scheduling Order relating to the above shall remain unchanged, including the pre-trial and trial dates. IT IS SO STIPULATED. Dated: July 13, 2017 MISSION LAW FIRM, A.P.C. /// Tanya E. Moore Tanya E. Moore Tanya E. Moore Attorney for Plaintiff, Mark Hauseur Dated: July 13, 2017 LeBEAU – THELEN, LLP /// Thomas P. Feher Thomas P. Feher Attorneys for Defendant, Natalie Clark Dated: July 13, 2017 RIVERA & ASSOCIATES /// Jonathan B. Paul Jonathan B. Paul Attorneys for Defendant,	6	Expert discovery cutoff	December 20, 2017	January 31, 2018	
Rebuttal expert disclosures November 30, 2017 January 11, 2018 Dispositive motion filing deadline The Parties additionally stipulate to continue the Discovery Status Conference set for August 7, 2017, to a date on or around October 16, 2017 at the Court's convenience. All other requirements set forth in the Scheduling Order relating to the above shall remain unchanged, including the pre-trial and trial dates. IT IS SO STIPULATED. Dated: July 13, 2017 MISSION LAW FIRM, A.P.C. **S' Tanya E. Moore** Tanya E. Moore** Attorney for Plaintiff, Mark Hauseur Dated: July 13, 2017 LeBEAU – THELEN, LLP **S' Thomas P. Feher** Thomas P. Feher** Attorneys for Defendant, Natalie Clark Dated: July 13, 2017 RIVERA & ASSOCIATES **S' Jonathan B. Paul** Jonathan B. Paul** Attorneys for Defendant,		Expert disclosures	October 31, 2017	December 12, 2017	
Dispositive motion filing february 28, 2018 April 11, 2018 deadline The Parties additionally stipulate to continue the Discovery Status Conference set for August 7, 2017, to a date on or around October 16, 2017 at the Court's convenience. All other requirements set forth in the Scheduling Order relating to the above shall remain unchanged, including the pre-trial and trial dates. IT IS SO STIPULATED. Dated: July 13, 2017 MISSION LAW FIRM, A.P.C. /s/ Tanva E. Moore Tanya E. Moore Attorney for Plaintiff, Mark Hauseur Dated: July 13, 2017 LeBEAU – THELEN, LLP /s/ Thomas P. Feher Thomas P. Feher Attorneys for Defendant, Natalie Clark Dated: July 13, 2017 RIVERA & ASSOCIATES /s/ Jonathan B. Paul Jonathan B. Paul Jonathan B. Paul Attorneys for Defendant,		Rebuttal expert disclosures	November 30, 2017	January 11, 2018	
The Parties additionally stipulate to continue the Discovery Status Conference set for August 7, 2017, to a date on or around October 16, 2017 at the Court's convenience. All other requirements set forth in the Scheduling Order relating to the above shall remain unchanged, including the pre-trial and trial dates. IT IS SO STIPULATED. Dated: July 13, 2017 MISSION LAW FIRM, A.P.C. /s/ Tanya E. Moore Tanya E. Moore Attorney for Plaintiff, Mark Hauseur Dated: July 13, 2017 LeBEAU – THELEN, LLP /s/ Thomas P. Feher Thomas P. Feher Attorneys for Defendant, Natalie Clark Dated: July 13, 2017 RIVERA & ASSOCIATES /s/ Jonathan B. Paul Jonathan B. Paul Jonathan B. Paul Attorneys for Defendant,		1 1	February 28, 2018	April 11, 2018	
for August 7, 2017, to a date on or around October 16, 2017 at the Court's convenience. All other requirements set forth in the Scheduling Order relating to the above shall remain unchanged, including the pre-trial and trial dates. IT IS SO STIPULATED. Dated: July 13, 2017 MISSION LAW FIRM, A.P.C. /// Tanya E. Moore Tanya E. Moore Attorney for Plaintiff, Mark Hauseur Dated: July 13, 2017 LeBEAU – THELEN, LLP /// Thomas P. Feher Attorneys for Defendant, Natalie Clark Dated: July 13, 2017 RIVERA & ASSOCIATES /// Jonathan B. Paul Jonathan B. Paul Jonathan B. Paul Attorneys for Defendant,	11	deadline			
All other requirements set forth in the Scheduling Order relating to the above shall remain unchanged, including the pre-trial and trial dates. IT IS SO STIPULATED. Dated: July 13, 2017 MISSION LAW FIRM, A.P.C. /s/ Tanya E. Moore Tanya E. Moore Attorney for Plaintiff, Mark Hauseur Dated: July 13, 2017 LeBEAU – THELEN, LLP /s/ Thomas P. Feher Attorneys for Defendant, Natalie Clark Dated: July 13, 2017 RIVERA & ASSOCIATES /s/ Jonathan B. Paul Jonathan B. Paul Jonathan B. Paul Attorneys for Defendant,	12	The Parties additionally stipulate to continue the Discovery Status Conference set			
remain unchanged, including the pre-trial and trial dates. IT IS SO STIPULATED. Dated: July 13, 2017 MISSION LAW FIRM, A.P.C. /s/Tanya E. Moore Tanya E. Moore Attorney for Plaintiff, Mark Hauseur Dated: July 13, 2017 LeBEAU – THELEN, LLP /s/Thomas P. Feher Thomas P. Feher Attorneys for Defendant, Natalie Clark Dated: July 13, 2017 RIVERA & ASSOCIATES /s/Jonathan B. Paul Jonathan B. Paul Jonathan B. Paul Attorneys for Defendant,	13	for August 7, 2017, to a date on or around October 16, 2017 at the Court's convenience.			
IT IS SO STIPULATED. Dated: July 13, 2017 MISSION LAW FIRM, A.P.C. 18	14	All other requirements set forth in the Scheduling Order relating to the above shall			
Dated: July 13, 2017 MISSION LAW FIRM, A.P.C. /s/ Tanya E. Moore Tanya E. Moore Attorney for Plaintiff, Mark Hauseur Dated: July 13, 2017 LeBEAU – THELEN, LLP /s/ Thomas P. Feher Thomas P. Feher Attorneys for Defendant, Natalie Clark Dated: July 13, 2017 RIVERA & ASSOCIATES /s/ Jonathan B. Paul Jonathan B. Paul Attorneys for Defendant, Attorneys for Defendant,	15	remain unchanged, including the pre-trial and trial dates.			
17 18 20 21 21 22 22 23 24 24 25 26 26 27 28 28 28 28 28 29 20 20 20 20 20 21 20 21 20 21 21 22 22 23 24 25 26 27 28 28 28 28 28 28 28 28 28 28 28 28 28	16	IT IS SO STIPULATED.			
Tanya E. Moore Attorney for Plaintiff, Mark Hauseur Dated: July 13, 2017 LeBEAU – THELEN, LLP /s/ Thomas P. Feher Thomas P. Feher Attorneys for Defendant, Natalie Clark Dated: July 13, 2017 RIVERA & ASSOCIATES /s/ Jonathan B. Paul Jonathan B. Paul Attorneys for Defendant, Attorneys for Defendant,	17	Dated: July 13, 2017 MISSION LAW FIRM, A.P.C.		FIRM, A.P.C.	
Attorney for Plaintiff, Mark Hauseur Dated: July 13, 2017 LeBEAU – THELEN, LLP /s/Thomas P. Feher Thomas P. Feher Attorneys for Defendant, Natalie Clark Dated: July 13, 2017 RIVERA & ASSOCIATES /s/ Jonathan B. Paul Jonathan B. Paul Attorneys for Defendant, Attorneys for Defendant,	18				
Dated: July 13, 2017 LeBEAU – THELEN, LLP /s/ Thomas P. Feher Thomas P. Feher Attorneys for Defendant, Natalie Clark Dated: July 13, 2017 RIVERA & ASSOCIATES /s/ Jonathan B. Paul Jonathan B. Paul Attorneys for Defendant, Attorneys for Defendant,	19			ntiff,	
22 /s/ Thomas P. Feher Thomas P. Feher Attorneys for Defendant, Natalie Clark 25 Dated: July 13, 2017 RIVERA & ASSOCIATES 26 /s/ Jonathan B. Paul Jonathan B. Paul Attorneys for Defendant,	20		Mark Hauseur		
Thomas P. Feher Attorneys for Defendant, Natalie Clark Dated: July 13, 2017 RIVERA & ASSOCIATES /s/ Jonathan B. Paul Jonathan B. Paul Attorneys for Defendant,	21	Dated: July 13, 2017 LeBEAU – THELEN, LLP			
Attorneys for Defendant, Natalie Clark Dated: July 13, 2017 RIVERA & ASSOCIATES /s/ Jonathan B. Paul Jonathan B. Paul Attorneys for Defendant,	22		· · · · · · · · · · · · · · · · · · ·		
24 Natalie Clark 25 Dated: July 13, 2017 RIVERA & ASSOCIATES 27 /s/ Jonathan B. Paul	23				
Dated: July 13, 2017 RIVERA & ASSOCIATES /s/ Jonathan B. Paul Jonathan B. Paul Attorneys for Defendant,	24		•	,	
26 27 28 S/ Jonathan B. Paul Jonathan B. Paul Attorneys for Defendant,	25	Dated: July 13, 2017	DIVEDA & ASS	OCIATES	
Jonathan B. Paul Attorneys for Defendant,	26	Dated: July 15, 2017 KIVERA & ASSOCIATES			
11	27				
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STIPULATION TO AMEND SCHEDULING ORDER; ORDER

Dated: July 13, 2017 WILLIAMS & ASSOCIATES

/s/ Martha M. Stringer
Martha M. Stringer
Attorneys for Defendant,
Antoneya Graves

<u>ORDER</u>

The Parties having so stipulated and good cause appearing,

IT IS HEREBY ORDERED that the Scheduling Order, dated March 10, 2017 (ECF No. 54), is amended as follows:

<u>Event</u>	Current Date	New Date
Non-expert discovery cutoff	September 29, 2017	November 10, 2017
Expert discovery cutoff	December 20, 2017	January 31, 2018
Expert disclosures	October 31, 2017	December 12, 2017
Rebuttal expert disclosures	November 30, 2017	January 11, 2018
Dispositive motion filing deadline	February 28, 2018	April 11, 2018

IT IS FURTHER ORDERED that the Telephonic Discovery Status Conference currently set for August 7, 2017, is continued to October 19, 2017, at 2:00 p.m. in Courtroom 10 before Magistrate Judge Erica P. Grosjean. The Parties have leave to appear by phone. To join the conference, each party is directed to call the toll-free number (888) 251–2909 and use Access Code 1024453. Up until two weeks before the discovery conference, the parties may file a motion to compel further discovery responses. One week before the discovery conference, the responding party may file a response to the motion to compel. The motion should include a copy of the request(s) and any response to the request(s) at issue. Unless there is a need for discovery prior to the discovery conference, motions to compel will not be considered until the discovery conference. Motions to compel will not be permitted after the discovery conference absent good cause. The parties should be prepared to address all

1	discovery disputes at the discovery conference.		
2	All other requirements set forth in the Scheduling Order relating to the above shall		
3	remain unchanged, including the pre-trial and trial dates.		
4	These revised dates should be considered as firm. No further extensions of these		
5	deadlines will be granted absent a showing of good cause and a scheduling conference with the		
6	Court.		
7			
8	IT IS SO ORDERED.		
9	Dated: July 14, 2017 /s/ Encir P. Story		
10	Dated: July 14, 2017 UNITED STATES MAGISTRATE JUDGE		
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