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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

GRACIE ZAPATA, an individual,	)	Case No. 1:14-CV-02027-EPG
	)	
Plaintiff,	)	Trial Date: October 18, 2016
vs.	)	Date Action Filed: October 28, 2014
	)	
THE NEIL JONES FOOD CO., a	)	<b>STIPULATION AND JOINT REQUEST FOR ORDER EXTENDING DEADLINES TO DISCLOSE EXPERT WITNESSES AND TO COMPLETE DISCOVERY FROM EXPERTS; ORDER EXTENDING DEADLINES</b>
Corporation; and Does 1 through 10,	)	
inclusive,	)	
Defendants.	)	
	)	

WHEREAS in paragraph 6 of their Joint Scheduling Report filed February 17, 2015 (ECF No. 4), the parties requested that the deadlines to disclose expert witnesses and take discovery from experts be set sufficiently after the hearing on dispositive motions so that the parties are not required to incur the expense of retaining experts and having reports prepared on issues that are disposed of prior to trial by way of those motions;

WHEREAS the parties renewed the above request in their Addendum to Joint Scheduling Report filed March 3, 2015 (ECF No. 8);

WHEREAS the Scheduling Conference Order filed March 4, 2015 (ECF No. 10) set the initial deadline for disclosure of expert witnesses for May 16, 2016, which was almost sixty (60) days after dispositive motions were to be heard;

WHEREAS both parties filed dispositive motions on February 26, 2016, which was the deadline set by the Scheduling Conference Order for the filing of such motions;

WHEREAS the parties' dispositive motions were initially scheduled for hearing on March 24, 2016, but the hearing on those motions was continued to May 6, 2016 to accommodate the Court's and the parties' counsel's schedules;

NOW THEREFORE, the parties through counsel stipulate and jointly request that the Court

1 extend the deadlines to make expert witness disclosures, to make rebuttal expert witness disclosures,  
2 and to complete discovery from expert witnesses as follows:

3	Expert witness disclosure deadline	July 29, 2016
4	Rebuttal expert witness disclosure deadline	August 29, 2016
5	Deadline to complete discovery from experts	September 30, 2016

6 IT IS SO STIPULATED AND JOINTLY REQUESTED.

7 Date: May 10, 2016

FOSTER EMPLOYMENT LAW

8  
9 By: /s/ MICHAEL E. WILBUR  
10 MICHAEL E. WILBUR  
11 Attorneys for Defendant  
12 THE NEIL JONES FOOD COMPANY

11 Date: May 10, 2016

LAW OFFICE OF KEVIN SCHWIN

13 By: /s/ KEVIN SCHWIN  
14 KEVIN SCHWIN  
15 Attorney for Plaintiff  
16 GRACIE ZAPATA

17 **ORDER**

18 The Court has reviewed the above joint request and adopts the stipulation. (Doc. 29). The  
19 following deadlines shall be modified in this Court's scheduling order issued on March 4,  
20 2015. (Doc. 10).

19	Expert witness disclosure deadline	July 29, 2016
20	Rebuttal expert witness disclosure deadline	August 29, 2016
21	Deadline to complete discovery from experts	September 30, 2016

22  
23 IT IS SO ORDERED.

24 Dated: May 16, 2016

25 /s/ Eric P. Gray  
26 UNITED STATES MAGISTRATE JUDGE