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Attorneys for Defendant WAWONA FROZEN FOODS

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

LUIS AGUILAR and VIDA RAMOS, on
behalf of themselves and on behalf of all
other similarly situated individuals,

Plaintiffs,

v.

WAWONA FROZEN FOODS;
WAWONA EXPORT; WAWONA
PACKING CO. LLC, and DOES 1–50,
inclusive,

Defendants.

No. 1:15-cv-00093-DAD-EPG

STIPULATION TO EXTEND DEADLINES
WHILE THE PARTIES ATTEND
MEDIATION; ORDER

Whereas, the Court's May 20, 2015 Pretrial Scheduling Order bifurcating discovery and
the Court's January 26, 2016 Order set the following deadlines:

Phase I Discovery Completion Date: May 9, 2016

Phase I Expert Witness Disclosures: April 22, 2016

1 Phase I Supplemental Expert Disclosures: 20 days after expert disclosure

2 Filing of Motion for Class Certification: May 20, 2016

3 *Whereas*, the Parties have agreed to mediate this case before Judge Patrick J. O'Hara
4 (retired) on May 3, 2016;

5 *Whereas*, the Parties have agreed to a sixty (60) day extension of the above deadlines to
6 allow the parties to focus on mediation and potentially avoid the expense of additional discovery.

7 **THEREFORE**, IT IS HEREBY STIPULATED by and between the Parties through their
8 attorneys of record that the deadlines below be extended by sixty (60) days as follows:

9 Motion for Order Requiring Plaintiff to Submit a Trial Plan is set for June 13, 2016.

10 Phase I Discovery Completion Date: July 8, 2016

11 Phase I Expert Witness Disclosures: June 21, 2016

12 Phase I Supplemental Expert Disclosures: 20 days after expert disclosure

13 Filing of Motion for Class Certification: July 19, 2016

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15 Respectfully submitted,

16 **THE DOWNEY LAW FIRM, LLC**

17 Dated: 04/06/16 /s/ Philip Downey

18 Philip A. Downey

19 Counsel for the Plaintiffs and the proposed Class

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21 **SAGASER, WATKINS & WIELAND, PC**

22 Dated: 04/06/16 /s/ Ian Weiland

23 Ian Weiland

24 Counsel for Defendant, Wawona Frozen Foods

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1 **ORDER**

2 **The following deadlines are extended as set forth below:**

3 Motion for Order Requiring Plaintiff to Submit a Trial Plan is set for June 13, 2016.

4 Phase I Discovery Completion Date: July 8, 2016

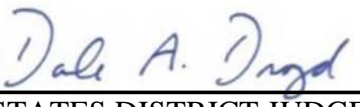
5 Phase I Expert Witness Disclosures: June 21, 2016

6 Phase I Supplemental Expert Disclosures: 20 days after expert disclosure

7 Filing of Motion for Class Certification: July 19, 2016

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9 IT IS SO ORDERED.

10 Dated: **April 7, 2016**

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13 UNITED STATES DISTRICT JUDGE
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