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23 **UNITED STATES DISTRICT COURT FOR THE**
24 **EASTERN DISTRICT OF CALIFORNIA**
25 **FRESNO DIVISION**

26 LUIS AGUILAR and VIDA RAMOS, on behalf) Case No.: 1:15-cv-00093-DAD-EPG
27 of themselves and on behalf of all other similarly)
28 situated individuals,) **STIPULATION AND ORDER TO**
) **EXTEND DEADLINES WHILE THE**
) **PARTIES CONTINUE SETTLEMENT**
) **NEGOTIATIONS WITH THE**
) **ASSISTANCE OF THE MEDIATOR**
)
29 WAWONA FROZEN FOODS; WAWONA)
30 EXPORT; WAWONA PACKING CO. LLC., and)
31 DOES 1-50, inclusive,)
32 Defendants.)

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Whereas, the Court’s April 7, 2016 Order set the following deadlines:

- Phase I Discovery Completion Date: July 8, 2016
- Phase I Expert Witness Disclosures: June 21, 2016
- Phase I Supplemental Expert Disclosures: 20 days after expert disclosure
- Filing of Motion for Class Certification: July 19, 2016

Whereas, on May 3, 2016, the Parties attended a mediation before Judge Patrick J. O’Hara (retired);

Whereas, the Parties did not reach a settlement but desire to continue settlement negotiations with the assistance of the mediator;

Whereas, Defense counsel begins a lengthy trial on May 10, 2016 and after the trial ends;

Whereas, the Parties have agreed to a forty-five (45) day extension of the above deadlines (with a 30-day stay of discovery starting May 6, 2016) to allow the parties to continue to negotiate a settlement and potentially avoid the expense of additional discovery.

THEREFORE, IT IS HEREBY STIPULATED by and between the Parties through their attorneys of record that the deadlines below be extended as follows:

- Phase I Discovery Completion Date: August 22, 2016
- Phase I Expert Witness Disclosures: August 5, 2016
- Phase I Supplemental Expert Disclosures: 20 days after expert disclosure
- Filing of Motion for Class Certification: September 2, 2016

Respectfully submitted,

LAW OFFICES OF ROBERT W. SINK

Dated: 5/9/16

/s/ Robert Sink
Robert W. Sink
Counsel for the Plaintiffs and the proposed Class

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THE DOWNEY LAW FIRM, LLC

Dated: 5/9/16

/s/ Philip Downey
Philip A. Downey
Counsel for the Plaintiffs and the proposed Class

SAGASER, WATKINS & WIELAND, PC

Dated: 5/9/16

/s/ Howard Sagaser
Howard A. Sagaser
Counsel for Defendant, Wawona Frozen Foods

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ORDER

The following deadlines are extended as set forth below:

Phase I Discovery Completion Date:	August 22, 2016
Phase I Expert Witness Disclosures:	August 5, 2016
Phase I Supplemental Expert Disclosures:	20 days after expert disclosure
Filing of Motion for Class Certification:	September 2, 2016

IT IS SO ORDERED.

Dated: May 9, 2016


UNITED STATES DISTRICT JUDGE