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DNOW, L.P.

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**UNITED STATES DISTRICT COURT**

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**EASTERN DISTRICT OF CALIFORNIA**

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16 JORGE MEDINA, an individual

17 Plaintiff,

18 vs.

19 DNOW, L.P. and DOES 1 through 10, inclusive

20 Defendant.

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Case No. 1:15-CV-00235-DAD-JLT

Assigned to:  
District Judge Dale A. Drozd  
Magistrate Judge Jennifer L. Thurston

**JOINT STIPULATION TO CONTINUE  
TRIAL DATE AND RELATED CASE  
DEADLINES; ORDER**

1 **TO THE ABOVE HONORABLE COURT:**

2 Plaintiff JORGE MEDINA (“Plaintiff”) and Defendant DNOW, L.P. (“Defendant”)  
3 (collectively the “Parties”), agree as follows:

4 1. The parties agree that good cause exists to continue the trial date and related  
5 deadlines for the following reason(s).

6 2. The deadline to complete fact discovery is April 29, 2016 and the deadline to file  
7 dispositive motions is July 1, 2016. Through no fault of either party, Defendant has been unable to  
8 complete depositions it must conduct in advance of these deadlines, including the deposition of  
9 Michelle Owens, who submitted a written statement purportedly in support of Plaintiff’s  
10 allegations and failed to appear for her deposition.

11 3. The parties agree that neither party will be prejudiced by the stipulated continuance.

12 4. Accordingly, the parties request that the trial date and related case deadlines be  
13 continued as follows:

<b>Event</b>	<b>Current Deadline</b>	<b>New Deadline</b>
Fact Discovery Cutoff	April 29, 2016	August 19, 2016
Dispositive Motion Filing Deadline	May 17, 2016	September 20, 2016
Dispositive Motion Hearing Deadline	July 1, 2016	October 18, 2016
Expert Disclosures	May 12, 2016	August 26, 2016
Supplemental Expert Disclosures	June 7, 2016	September 23, 2016
Expert Discovery Cutoff	July 6, 2016	October 26, 2016
Final Pretrial Conference	September 26, 2016	December 19, 2016
Trial	November 15, 2016	February 14, 2017

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24 5. Any dates or deadlines not expressly referenced above will be continued by the  
25 same number of days as the trial date is continued.

26 6. This is the first time that the parties have requested a continuance of the trial date in  
27 this matter.

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DATED: April 29, 2016

OGLETREE, DEAKINS, NASH, SMOAK &  
STEWART, P.C.

By: /s/ Natalie R. Alameddine  
Christian Keeney  
Natalie R. Alameddine

Attorneys for Defendant  
DNOW, L.P.

DATED: April 29, 2016

By: /s/ John L Migliazzo  
(as authorized on April 29, 2016)  
Michael J.F. Smith  
John L Migliazzo

Attorneys for Plaintiff  
JORGE MEDINA

1 **ORDER**

2 Upon consideration of the Parties' Joint Stipulation to Continue Discovery and Dispositive  
3 Motions Deadlines, and good cause appearing,

4 **IT IS HEREBY ORDERED THAT:**

5 1. The trial date and related case deadlines be continued as follows:

Event	Current Deadline	New Deadline
Fact Discovery Cutoff	April 29, 2016	August 19, 2016
Dispositive Motion Filing Deadline	May 17, 2016	September 20, 2016
Dispositive Motion Hearing Deadline	July 1, 2016	October 18, 2016
Expert Disclosures	May 12, 2016	August 26, 2016
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16 2. Any dates or deadlines not expressly referenced above will be continued by the  
17 same number of days as the trial date is continued.

18 IT IS SO ORDERED.

19 Dated: May 2, 2016

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21 UNITED STATES DISTRICT JUDGE