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6 MANAGEMENT & TRAINING
CORPORATION
7

8 UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA

10
11 LUIS C. DOMINGO,

12 Plaintiff,

13 v.

14 MANAGEMENT & TRAINING
CORPORATION, AND JOHN
15 DOES
1 - 9.,

16 Defendants.
17

Case No. 1:15-cv-00284-AWI-JLT

**STIPULATION AND [PROPOSED]
ORDER TO SET SETTLEMENT
CONFERENCE AND MODIFYING
SCHEDULING ORDER TO
EXTEND TIME FOR EXPERT
DISCOVERY**

(Doc. 70)

18 Plaintiff Luis C. Domingo, and the Defendant Management & Training
19 Corporation (“MTC”) (collectively “the parties”), by and through their respective
20 counsel, respectfully submit this stipulation and proposed order setting a settlement
21 conference for March 5, 2018, and modifying the scheduling order to allow expert
22 discovery to extend beyond the dates currently set in the scheduling order. All
23 parties have been engaging in settlement discussions, and are interested in resolving
24 the case without incurring further attorneys’ fees or costs.

25 Therefore, the parties request the assistance of the Honorable Jennifer L.
26 Thurston to resolve these cases with a settlement conference at 10:00 a.m. on
27 March 5, 2018, which date has been cleared with the Court.
28

1 Additionally, in an effort to focus on settlement negotiations, the parties, by
2 and through their respective counsel, stipulate and respectfully request the brief
3 continuation of the expert dates outlined below. The proposed date changes will not
4 affect the November 14, 2018 trial date. The current and proposed schedules are
5 provided below for the Court's reference.

	<u>Current</u>	<u>Proposed</u>
6 Plaintiff's Expert Disclosures	2/23/2018	3/9/2018
7 Defendants' Expert Disclosures	3/9/2018	3/23/2018
8 Rebuttal Expert Disclosures	3/23/2018	4/2/18

11 Dated: February __, 2018

BURKE, WILLIAMS & SORENSEN, LLP

13 By: _____

14 Susan E. Coleman
15 Kristina Doan Gruenberg

16 Attorneys for Defendant
17 MANAGEMENT & TRAINING
18 CORPORATION

19 Dated: February __, 2018

BOUCHER, LLP

21 By: _____

22 Hermez Moreno
23 Raymond Paul Boucher
24 Milin Chun
25 Brian M. Bush

26 Attorneys for Plaintiff
27 LUIS C. DOMINGO

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ORDER

Based upon the stipulation counsel, the Court **ORDERS**:

- 1. The Court sets a settlement conference on March 5, 2018 at **1:30 p.m.**;
- 2. The case schedule is modified as follows:
 - a. Plaintiff’s expert disclosure: **March 9, 2018**;
 - b. Defendants’ expert disclosure: **March 23, 2018**;
 - c. Plaintiff’s rebuttal expert disclosure: **April 2, 2018**;
 - d. Expert discovery deadline: **April 27, 2018**

IT IS SO ORDERED.

Dated: **February 16, 2018**

/s/ Jennifer L. Thurston
UNITED STATES MAGISTRATE JUDGE