

Attorney for Plaintiff  
Jose Escobedo

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

Defendants.

**STIPULATION FOR CONTINUANCE OF  
MANDATORY SCHEDULING  
CONFERENCE; ORDER**

WHEREAS, Defendants, Kenneth A. Bocchini and Susan L. Bocchini, Trustees of the Kenneth A. and Susan L. Bocchini Family Trust (collectively “Defendants”) are in the process of obtaining a Certified Access Specialist Report for the Facility and will provide it to Plaintiff, Jose Escobedo (“Plaintiff,” and together with Defendants, “the Parties”), and the Parties

1 anticipate using the report as a basis to reach an informal resolution of Plaintiff's equitable  
2 claims;

3 WHEREAS, the Parties are actively engaged in settlement discussions and are  
4 optimistically hopeful that a full settlement can be reached within the next six weeks;

5 WHEREAS, the Parties desire to conserve judicial resources and avoid incurring  
6 additional attorney fees and costs;

7 NOW, THEREFORE, the Parties, by and through their respective counsel, stipulate to a  
8 continuance of the Mandatory Scheduling Conference currently set for June 17, 2015 to a date  
9 at the Court's convenience on or after July 15, 2015, to allow time for the Parties to exhaust  
10 settlement efforts.

11  
12 Dated: June 3, 2015

MOORE LAW FIRM, P.C.

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14 /s/ Tanya E. Moore

Tanya E. Moore  
Attorney for Plaintiff,  
Jose Escobedo

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17  
18 Dated: June 3, 2015

/s/ Michael L. Elder

Michael L. Elder  
Attorney for Defendants,  
Kenneth A. Bocchini and Susan L. Bocchini,  
Trustees of the Kenneth A. and Susan L. Bocchini  
Family Trust

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**ORDER**

The parties having so stipulated and good cause appearing,

IT IS HEREBY ORDERED that the Mandatory Scheduling Conference currently set for June 17, 2015 is continued to **August 19, 2015 at 9:00 a.m.** The Parties shall file a joint scheduling report one week prior to the Scheduling Conference.

IT IS SO ORDERED.

Dated: June 8, 2015

/s/ Barbara A. McAuliffe  
UNITED STATES MAGISTRATE JUDGE