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8 AGRESERVES, INC. dba SOUTH VALLEY
9 FARMS

10 UNITED STATES DISTRICT COURT
11 EASTERN DISTRICT OF CALIFORNIA

12 LEONEL ROJAS RIVERA, individually and on) Case No.: 1:15-CV-00613- JLT
13 behalf of other persons similarly situated,)

14 Plaintiff,)

15 vs.)

16 AGRESERVES, INC. dba SOUTH VALLEY) (Doc. 23)
17 FARMS; and SOUTH VALLEY ALMOND)
18 COMPANY, LLC; and DOES 1 through 10,)

19 Defendants.)
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1 TO THIS HONORABLE COURT:

2 Plaintiff Leonel Rojas Rivera, by and through his attorneys of record, and Defendant
3 AgReserves, Inc. dba South Valley Farms (“AgReserves”) by and through their attorneys of
4 record, hereby stipulate to request that the Court extend certain Scheduling Order dates [Docket
5 No. 17] – specifically the non-expert discovery cut-off, the expert discovery cut off, the deadline
6 for Plaintiff to file class certification motion, and dispositive motion hearing cut-off dates, as
7 follows:

8 WHEREAS, the Parties have worked diligently to conduct discovery in this matter,
9 including exchanging and responding to the initial set of written discovery by both sides, and
10 taking the deposition of Plaintiff Leonel Rojas Rivera;

11 WHEREAS, despite the Parties’ efforts, a substantial amount of discovery to be
12 conducted, including but not limited to, additional written discovery regarding class certification
13 issues, and the potential need for additional depositions;

14 WHEREAS, the Parties are working diligently to complete this long discovery process;

15 WHEREAS, the Parties have agreed to participate in a private mediation in this matter on
16 May 31, 2016;

17 WHEREAS, if the matter does not resolve upon private mediation, the parties would like
18 more time to prepare additional discovery by mutually agreeing to extend operative scheduling
19 dates from the Scheduling Order;

20 WHEREAS, the current operative dates [Docket No. 17] are as follows:

- 21 • Non-Expert Discovery Cut-Off: June 6, 2016
- 22 • Expert Discovery Cut-Off: August 22, 2016
- 23 • Filing of Class Certification Deadline: October 17, 2016
- 24 • Opposition to Class Certification Deadline: December 5, 2016
- 25 • Reply brief to Class Certification Deadline: January 9, 2017
- 26 • Hearing on Class Certification: February 8, 2017

27 WHEREAS, the Parties propose a continuance of the previously calendared dates to
28 allow for proper discovery and full exploration of mediation options, as follows:

1 **IT IS SO STIPULATED.**

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3 Dated: May 2, 2016

KARASIK LAW FIRM

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6 By: /s/ Gregory N. Karasik

7 Gregory N. Karasik
8 Attorneys for Plaintiff,
9 LEONEL ROJAS RIVERA, on behalf of
himself and all others similarly situated

10 Dated: May 2, 2016

GRESHAM SAVAGE NOLAN & TILDEN, PC

11
12 By: /s/ Richard D. Marca

13 Richard D. Marca
14 Jamie E. Wrage
15 Jeff T. Olsen
16 Attorneys for Defendants, AGRESESERVES,
17 INC dba SOUTH VALLEY FARMS

18 **ORDER**

19 Based upon the stipulation and after conducting an informal telephonic conference with
20 counsel, the Court **ORDERS:**

21 1. The stipulation is **GRANTED in PART** as follows:

22 a. The deposition of Plaintiff and the Fed. R. Civ. P. 30(b) deponent **SHALL**
23 be completed no later than **July 15, 2016;**

24 b. Expert disclosures **SHALL** be made no later than **July 29, 2016** and
25 rebuttal experts disclosed no later than **August 26, 2016;**

26 c. Expert discovery **SHALL** be completed no later than **September 16,**
27 **2016;**

1 d. Non-dispositive motions **SHALL** be filed no later than **September 30,**
2 **2016** and heard no later than **October 28, 2016;**

3 e. The motion for class certification **SHALL** be filed no later than
4 **November 25, 2016;**

5 f. Opposition to the motion for class certification **SHALL** be filed no later than
6 **January 13, 2017;**

7 g. The reply to the opposition to the motion for class certification **SHALL** be filed
8 no later than **February 10, 2017;**

9 h. The hearing on the motion for class certification is **CONTINUED** to **February**
10 **27, 2017** at 9:30 a.m.

11 **No other modifications to the case schedule are authorized.**

12
13 IT IS SO ORDERED.

14 Dated: May 6, 2016

/s/ Jennifer L. Thurston
UNITED STATES MAGISTRATE JUDGE