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MISSION LINEN SUPPLY
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7 UNITED STATES DISTRICT COURT
8 EASTERN DISTRICT OF CALIFORNIA, FRESNO DIVISION
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10 MISSION LINEN SUPPLY,
11 Plaintiff,
12 v.
13 CITY OF VISALIA,
14 Defendant.

Case No. 1:15-cv-00672-AWI-EPG

**STIPULATION AND JOINT REQUEST
FOR EXTENSION OF TIME
REGARDING CLOSE OF NON-
EXPERT DISCOVERY AND EXPERT
DISCOVERY AND ORDER**

Date Complaint Filed: May 1, 2015
Trial Date: December 13, 2016

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16 Plaintiff Mission Linen Supply (“Plaintiff”), by and through its attorney of record, Gualco
17 Law and Lori J. Gualco, and Defendant City of Visalia (“Defendant”), by and through its
18 attorneys of record, Herr Pedersen & Berglund LLP and Leonard C. Herr have worked diligently
19 to complete discovery in a timely manner, taking into account the schedules of witnesses and legal
20 counsel; however, with the ambitious schedule to which both initially agreed, that schedule cannot
21 be met given the full calendars of counsel, clients (corporate and city representatives) and
22 percipient and expert environmental consultants.

23 The parties have met and conferred on the issue of moving the following discovery dates
24 listed in numbers 1 through 4 below, and hereby stipulate and agree that good cause exists for an
25 extension of those discovery dates and agree that the extended discovery dates shall be as follows:

- 26 1. Date of Non-Expert Discovery Cutoff extended from March 16, 2016
27 to April 15, 2016;
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- 2. Date of Initial Expert Disclosure extended from May 2, 2016 to June 2, 2016;
- 3. Date of Rebuttal Expert Disclosure extended from May 16, 2016 to June 16, 2016; and
- 4. Date of Discovery Cutoff and Expert Discovery Cutoff extended from June 30, 2016 to July 29, 2016.

The parties jointly move for an order regarding the above dates.

Dated: February 8, 2016

GUALCO LAW

By: /s/ Lori J. Gualco (as authorized on 2/8/2016)
 LORI J. GUALCO
 Attorney for Plaintiff MISSION LINEN
 SUPPLY

Dated: February 8, 2016

HERR PEDERSEN & BERGLUND LLP

By: /s/ Leonard C. Herr
 LEONARD C. HERR
 Attorneys for Defendant CITY OF VISALIA

ORDER

Based on the above Joint Stipulation of Plaintiff Mission Linen Supply and Defendant City of Visalia (Doc. 15), the extended dates for discovery are as follows:

- 1. The Non-Expert Discovery Cutoff is extended from March 16, 2016 to April 15, 2016;
- 2. The Initial Expert Disclosure is extended from May 2, 2016 to June 2, 2016;
- 3. The Rebuttal Expert Disclosure is extended from May 16, 2016 to June 16, 2016; and
- 4. The Discovery Cutoff and Expert Discovery Cutoff is extended from June 30, 2016 to July 29, 2016.

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All other dates and orders outlined in the scheduling order issued on August 13, 2015
(Doc. 11) remain in full force and effect.

IT IS SO ORDERED.

Dated: February 9, 2016

/s/ Eric P. Gray
UNITED STATES MAGISTRATE JUDGE