

1 LORI J. GUALCO (Bar No. 95232)
GUALCO LAW
2 400 Capitol Mall, Eleventh Floor
Sacramento, CA 95814
3 Tel: (916) 930-0700
Fax: (916) 930-0705
4 Email: ljgualco@gualcolaw.com

5 Attorney for Plaintiff
MISSION LINEN SUPPLY
6

7 UNITED STATES DISTRICT COURT
8 EASTERN DISTRICT OF CALIFORNIA, FRESNO DIVISION
9

10 MISSION LINEN SUPPLY,
11 Plaintiff,
12 v.
13 CITY OF VISALIA,
14 Defendant.
15

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

**STIPULATION AND SECOND 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

16
17
18 Plaintiff Mission Linen Supply (“Plaintiff”), by and through its attorney of record, Gualco
19 Law and Lori J. Gualco, and Defendant City of Visalia (“Defendant”), by and through its
20 attorneys of record, Herr, Pedersen & Berglund LLP and Leonard C. Herr, having met and
21 conferred on the issue of moving the following discovery dates listed in numbers 1 through 4
22 below, hereby stipulate and agree that good cause exists for a second extension of discovery
23 dates in this case. The first extension of discovery dates was made on February 5, 2016 and an
24 order was signed and filed on February 8, 2016. Although Plaintiff’s and Defendant’s counsel
25 have worked diligently to complete discovery in a timely manner, the depositions of the below
26 three deponents have not been conducted due to counsel’s and client’s (corporate and city
27 representatives) busy schedules and other commitments. Also, Defendant City of Visalia’s
28 FRCP Rule 30(b)(6) witnesses are being coordinated for a joint deposition with the case entitled

1 *Coppola v. Paragon Cleaners, Inc., et al.*, Case No.1:11-CV-01257-AWI-BAM. The Plaintiff
2 and Defendant agree that the extended discovery dates shall be as follows:

- 3 1. Date of Non-Expert Discovery Cutoff extended from April 15, 2016 to May 15,
4 2016 *only* for the depositions of the following witnesses to be conducted:
5 Defendant City of Visalia FRCP Rule 30(b)(6) witness(es), Plaintiff Mission
6 Linen Supply FRCP Rule 30(b)(6) witness(es), and Donald Moore;
7 2. Date of Initial Expert Disclosure extended from June 2, 2016 to July 6, 2016;
8 3. Date of Rebuttal Expert Disclosure extended from June 16, 2016 to August 16,
9 2016; and
10 4. Date of Expert Discovery Cutoff extended from July 29, 2016 to August 29, 2016.

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

12
13 Dated: April 7, 2016

GUALCO LAW

14
15 By: /s/ Lori J. Gualco
16 LORI J. GUALCO
17 Attorney for Plaintiff MISSION LINEN
SUPPLY

18 Dated: April 7, 2016

HERR PEDERSEN & BERGLUND LLP

19
20 By: /s/ Leonard C. Herr, as authorized on 4/7/16
21 Leonard C. Herr
22 Ron Statler
Attorneys for Defendant CITY OF VISALIA

23 ORDER

24 Based on the above Joint Stipulation of Plaintiff Mission Linen Supply and Defendant
25 City of Visalia, the extended dates for discovery are as follows:

- 26 1. Date of Non-Expert Discovery Cutoff extended from April 15, 2016 to May 15, 2016
27 *only* for the depositions of the following witnesses to be conducted: Defendant City of

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Visalia FRCP Rule 30(b)(6) witness(es), Plaintiff Mission Linen Supply FRCP Rule 30(b)(6) witness(es), and Donald Moore;

- 2. Date of Initial Expert Disclosure extended from June 2, 2016 to July 6, 2016;
- 3. Date of Rebuttal Expert Disclosure extended from June 16, 2016 to August 16, 2016; and
- 4. Date of Expert Discovery Cutoff extended from July 29, 2016 to August 29, 2016.

All other dates and orders outlined in the scheduling order issued on August 13, 2015 (Doc. 11) remain in full force and effect, including the deadline for the filing of dispositive motions, the pretrial conference, and the trial.

IT IS SO ORDERED.

Dated: April 12, 2016

/s/ Eric P. Gray
UNITED STATES MAGISTRATE JUDGE