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7 8	UNITED STATES DISTRICT COURT		
o 9	EASTERN DISTRICT OF CALIFORNIA, FRESNO DIVISION		
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11	MISSION LINEN SUPPLY,	Case No. 1:15-cv-00672-AWI-EPG	
12	Plaintiff,	STIPULATION AND THIRD JOINT REQUEST FOR EXTENSION OF TIME	
13	v. CITY OF VISALIA,	REGARDING CLOSE OF NON- EXPERT DISCOVERY AND EXPERT DISCOVERY AND ORDER	
14	Defendant.	Discover 1 AND OKDER Date Complaint Filed: May 1, 2015	
15		Trial Date: December 13, 2016	
16		-	
17	Plaintiff Mission Linen Supply ("Plaintiff Mission"), by and through its attorney of		
18 19	record, Gualco Law and Lori J. Gualco, and Defendant City of Visalia ("Defendant City"), by		
20	and through its attorneys of record, Herr, Pedersen & Berglund LLP and Leonard C. Herr,		
21	having met and conferred on the issue of moving the following discovery dates listed in numbers		
22	1 through 4 below, hereby stipulate and agree that good cause exists for a third extension of		
23	discovery dates in this case. The stipulation and request for order granting a first extension of		
24	discovery dates was submitted on February	5, 2016 and an order was signed and filed on	
25	February 8, 2016. The stipulation and request	for order granting a second extension of discovery	
26	dates was submitted on April 7, 2016 and an order was signed on April 12, 2016 and filed on		
27	April 13, 2016. Defendant City's FRCP Rule 30(b)(6) witnesses were coordinated for a joint		
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GUALCO LAW 400 Capitol Mall Eleventh Floor Sacramento, CA 95814 deposition with the parties in the case entitled *Coppola v. Paragon Cleaners, Inc., et al.*, Case No.1:11-CV-01257-AWI-BAM.

3 Due to discovery being coordinated in this case and with the Coppola v. Paragon 4 *Cleaners, Inc., et al.* case for the depositions of Defendant City's Rule 30(b)(6) witnesses, and 5 those depositions being conducted the last week of April 2016, the parties have experienced a 6 delay in the scheduling of several additional specified Defendant City depositions to be taken in 7 8 this case and jointly in the Coppola v. Paragon Cleaners, Inc., et al. case. 9 The Plaintiff Mission and Defendant City agree that the extended discovery dates shall 10 be as follows: 11 1. Date of Non-Expert Discovery Cutoff extended from May 15, 2016 to June 15, 12 2016 for the depositions of the following witnesses to be conducted: Defendant 13 City of Visalia employees Jim Ross, Mike Olmos and Richard Paradez, and Brian 14 Vanciel, a former employee of the City of Visalia, to be conducted jointly with 15 16 the taking of these depositions in the Coppola v. Paragon Cleaners, Inc. et al. 17 case; 18 2. Date of Initial Expert Disclosure extended from July 6, 2016 to July 27, 2016; 19 3. Date of Rebuttal Expert Disclosure extended from August 16, 2016 to August 30, 20 2016; and 21 Date of Expert Discovery Cutoff extended from August 29, 2016 to September 4. 22 12, 2016. 23 24 Plaintiff Mission and Defendant City jointly move for an order regarding the above dates. 25 26 Dated: May 11, 2016 **GUALCO LAW** 27 28

GUALCO LAW 400 Capitol Mall Eleventh Floor Sacramento, CA 95814

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1 2 3	By: <u>/s/ Lori J. Gualco</u> LORI J. GUALCO Attorney for Plaintiff MISSION LINEN SUPPLY	
4	Dated: May 11, 2016HERR PEDERSEN & BERGLUND LLP	
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6 7	By: /s/ Leonard C. Herr, as authorized on 5-11-16 Leonard C. Herr	
8	Leonard C. Herr Ron Statler Attorneys for Defendant CITY OF VISALIA	
9	Automeys for Defendant CIT F OF VISALIA	
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400 Capitol Mall Eleventh Floor Sacramento, CA 95814	3 STIPULATION AND THIRD JOINT REQUEST FOR EXTENSION OF TIME RE: CLOSE OF NON-EXPERT & EXPERT DISCOVERY AND ORDER	

1 <u>ORDER</u>		
	2 Based on the above Joint Stipulation of Plaintiff Mission Linen Supply and Defendan	
City of Visalia, the extended dates for discovery are as follows:		
4	1. Date of Non-Expert Discovery Cutoff extended from May 15, 2016 to <b>June 15</b> ,	
6	2016 for the depositions of the following witnesses to be conducted: Defendant	
7	City of Visalia employees Jim Ross, Mike Olmos and Richard Paradez, and Brian	
8	Vanciel, a former employee of the City of Visalia, to be conducted jointly with	
9	the taking of these depositions in the Coppola v. Paragon Cleaners, Inc. et al.	
10	case;	
11	2. Date of Initial Expert Disclosure extended from July 6, 2016 to <b>July 27, 2016</b> ;	
12 13	3. Date of Rebuttal Expert Disclosure extended from August 16, 2016 to August 30,	
13	<b>2016</b> ; and	
15	4. Date of Expert Discovery Cutoff extended from August 29, 2016 to <b>September</b>	
16	12, 2016.	
<ul> <li>All other dates set forth in the scheduling order (ECF No. 11) remain</li> <li>including the deadline for the filing of dispositive motions, the pretrial conference data</li> </ul>		
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20 scheduling order that the parties have filed. The parties are thus advised that furthe		
21	21 modify the scheduling order will be viewed with disfever	
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24	IT IS SO ORDERED.	
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26	Dated: May 12, 2016 /s/ Cuca P. Shorp- UNITED STATES MAGISTRATE JUDGE	
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28 GUALCO LAW		
400 Capitol Mall Eleventh Floor Sacramento, CA 95814	4 STIPULATION AND THIRD JOINT REQUEST FOR EXTENSION OF TIME RE: CLOSE OF NON-EXPERT & EXPERT DISCOVERY AND ORDER	