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5 Attorney for Plaintiff  
MISSION LINEN SUPPLY  
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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 THIRD 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 Plaintiff Mission Linen Supply (“Plaintiff Mission”), by and through its attorney of  
18 record, Gualco Law and Lori J. Gualco, and Defendant City of Visalia (“Defendant City”), by  
19 and through its attorneys of record, Herr, Pedersen & Berglund LLP and Leonard C. Herr,  
20 having met and conferred on the issue of moving the following discovery dates listed in numbers  
21 1 through 4 below, hereby stipulate and agree that good cause exists for a third extension of  
22 discovery dates in this case. The stipulation and request for order granting a first extension of  
23 discovery dates was submitted on February 5, 2016 and an order was signed and filed on  
24 February 8, 2016. The stipulation and request for order granting a second extension of discovery  
25 dates was submitted on April 7, 2016 and an order was signed on April 12, 2016 and filed on  
26 April 13, 2016. Defendant City’s FRCP Rule 30(b)(6) witnesses were coordinated for a joint  
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1 deposition with the parties in the case entitled *Coppola v. Paragon Cleaners, Inc., et al.*, Case  
2 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 this case and jointly in the *Coppola v. Paragon Cleaners, Inc., et al.* case.

8 The Plaintiff Mission and Defendant City agree that the extended discovery dates shall  
9 be as follows:

- 10 1. Date of Non-Expert Discovery Cutoff extended from May 15, 2016 to June 15,  
11 2016 for the depositions of the following witnesses to be conducted: Defendant  
12 City of Visalia employees Jim Ross, Mike Olmos and Richard Paradez, and Brian  
13 Vanciel, a former employee of the City of Visalia, to be conducted jointly with  
14 the taking of these depositions in the *Coppola v. Paragon Cleaners, Inc. et al.*  
15 case;  
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- 17 2. Date of Initial Expert Disclosure extended from July 6, 2016 to July 27, 2016;
- 18 3. Date of Rebuttal Expert Disclosure extended from August 16, 2016 to August 30,  
19 2016; and
- 20 4. Date of Expert Discovery Cutoff extended from August 29, 2016 to September  
21 12, 2016.

22 Plaintiff Mission and Defendant City jointly move for an order regarding the above dates.  
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24 Dated: May 11, 2016

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

Dated: May 11, 2016

HERR PEDERSEN & BERGLUND LLP

By: /s/ Leonard C. Herr, as authorized on 5-11-16  
Leonard C. Herr  
Ron Statler  
Attorneys for Defendant CITY OF VISALIA

