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8 UNITED STATES DISTRICT COURT
 9 EASTERN DISTRICT OF CALIFORNIA

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11 MARIA I. JIMENEZ; LUIS ANDRES JIMENEZ;
 12 JOSE LUIS JIMENEZ, JR.; BRANDO LUIS
 13 JIMENEZ, a minor, by his Guardian ad Litem
 14 Maria I. Jimenez; AIME JASMINE JIMENEZ, a
 15 minor, by her Guardian ad Litem Maria I.
 16 Jimenez; AELLEN GEMA JIMENEZ, a minor, by
 her Guardian ad Litem Maria I. Jimenez; and
 NIMZY HAZEL JIMENEZ, a minor, by her
 Guardian ad Litem Maria I. Jimenez,

17 Plaintiffs,

18 vs.

19 VOLVO CE RENTS, INC.; BLUELINE RENTAL,
 20 LLC; TEICHERT, INC., dba TEICHERT
 21 CONSTRUCTION; A. TEICHERT & SONS,
 22 INC.; and DOES 1 – 20, inclusive,

23 Defendants.

24 WHEREAS the parties will be unable to complete the depositions of the parties and
 25 percipient witnesses by the current discovery deadline of October 25, 2016;

26 WHEREAS the parties have coordinated the following depositions to occur on the
 27 following dates: 9/26/16 Officer Macias in Modesto; 10/5/16 Mark Netjes in Modesto;
 10/11/16 Michelle Grubbs and John Caynak of OSHA in Sacramento; and 10/12/16 Dave

No. 1:15-CV-01259-TLN-SAB

**STIPULATION TO FURTHER
 EXTEND DEADLINES CONTAINED
 IN PRETRIAL SCHEDULING
 ORDER; ORDER EXTENDING
 DEADLINES**

1 Mello of Blueline Rental in Fresno.

2 In addition, the parties have met and conferred and identified these additional
3 dates for possible depositions: September 19, 21, 27, October 6, and 10, 2016.

4 Plaintiffs' counsel intends to depose 4 employees of Teichert Construction,
5 decedent's employer. These witnesses will be produced and represented by Teichert's
6 attorney who is involved in a two-month long trial and therefore has limited availability, and
7 so far has not been able to produce these witnesses in the allowed time.

8 In addition, defense counsel intends to take the depositions of all 7 plaintiffs,
9 2 employees from the coroner's office, and employees of the Merced County Fire
10 Department who responded to the scene of the accident.

11 WHEREAS the attorneys have met and conferred and agreed that an additional 50
12 days will be sufficient time to schedule and take the needed depositions;

13 WHEREAS the attorneys have also met and conferred and agreed that disclosing
14 experts within 30 days of completing discovery will allow sufficient time to depose said
15 experts as it is not anticipated there will be more than 5 experts per party;

16 WHEREAS the parties are working cooperatively to schedule the necessary
17 depositions and exchange discovery;

18 WHEREAS the parties are in agreement that all other deadlines listed in the Pre-
19 Trial Scheduling Order can be met;

20 The parties HEREBY STIPULATE AND AGREE that the deadline for completion of
21 discovery shall be extended from October 25, 2016 to December 16, 2016 and that the
22 deadline to disclose experts shall be extended from December 2, 2016 to January 16,
23 2017.

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