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11 Attorneys for Plaintiff, CHARLES
 JOHNSON

12
 13 UNITED STATES DISTRICT COURT
 14 EASTERN DISTRICT OF CALIFORNIA
 15 SACRAMENTO DIVISION

16 CHARLES JOHNSON,
 17 Plaintiff,
 18 v.
 19 REPUBLIC SERVICES, INC.,
 20 ALLIED WASTE SERVICES OF
 NORTH AMERICA, LLC and
 DOES 1 through 50, inclusive,
 21 Defendant.

Case No. 1:15-cv-01447-DAD-MJS

**JOINT STIPULATION TO
 CONTINUE NON-TRIAL
 DISCOVERY RELATED DATES
 AND ~~PROPOSED~~ ORDER
 THEREON**

Magistrate Judge: Michael Seng

Judge: Hon. Dale A. Drozd

1 Plaintiff Charles Johnson (“Plaintiff”), on the one hand, and Defendants
2 Republic Services, Inc. and Allied Waste Services of North America, LLC
3 (“Defendants”) on the other, by and through their respective counsel of record, hereby
4 stipulate and agree as follows:

5 **WHEREAS**, on March 31, 2016, a Scheduling Conference was held and
6 dates were set including a discovery cut off, expert disclosure deadlines, non-
7 dispositive and dispositive motion deadlines, a Final Pretrial Conference on April 10,
8 2017, and a five day Jury Trial on May 31, 2017;

9 **WHEREAS**, the Parties have been diligently engaging in written
10 discovery and plan on taking the depositions of Plaintiff and additional Company
11 witnesses of Defendants in October of 2016;

12 **WHEREAS**, the Parties would like a short continuance of approximately
13 six (6) weeks on all discovery-related deadlines in order to allow them to adequately
14 complete discovery;

15 **WHEREAS**, the requested short continuance will not impact the hearing
16 date on any dispositive motions, the Final Pretrial Conference or Jury Trial date;

17 **WHEREAS**, counsel for the Parties are working collaboratively to move
18 the case along efficiently;

19 **WHEREAS**, no prior continuances have been granted in this matter and
20 no party will suffer prejudice as a result of the proposed short continuance;

21 **NOW, THEREFORE**, Plaintiff and Defendants, by and through their
22 attorneys of record, hereby stipulate that the below dates be continued as follows:

EVENT	OLD DEADLINE	NEW DEADLINE
Non-Expert Discovery Cutoff	October 18, 2016	November 29, 2016
Expert Discovery Cutoff	November 18, 2016	December 30, 2016
Expert Disclosure Filing	October 1, 2016	November 11, 2016
Expert Disclosure Rebuttal	October 18, 2016	November 29, 2016

1 **IT IS SO STIPULATED.**

2
3 DATED: September 28, 2016

4 /s/ Eric P. Oren
ERIC P. OREN
5 Attorney for Plaintiff,
6 CHARLES JOHNSON

7 Respectfully submitted,

8 DATED: September 28, 2016

9 /s/ Eric C. Bellafronto
ERIC C. BELLAFRONTO
10 JOSE MACIAS, JR.
11 Attorneys for Defendants,
12 REPUBLIC SERVICES, INC. AND
13 ALLIED WASTE SERVICES OF NORTH
14 AMERICA, LLC
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ORDER

Counsel for the Parties in the above-captioned action submitted a Joint Stipulation to Continue all Non-Trial Discovery Related Deadlines.

After consideration of the papers submitted, and good cause appearing therefore, it is hereby **ORDERED** that, the below deadlines be continued as follows:

EVENT	OLD DEADLINE	NEW DEADLINE
Non-Expert Discovery Cutoff	October 18, 2016	November 29, 2016
Expert Discovery Cutoff	November 18, 2016	December 30, 2016
Expert Disclosure Filing	October 1, 2016	November 11, 2016
Expert Disclosure Rebuttal	October 18, 2016	November 29, 2016

IT IS SO ORDERED.

Dated: September 29, 2016

/s/ Michael J. Seng
UNITED STATES MAGISTRATE JUDGE