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7 Attorneys for Defendants
THE GEO GROUP, INC. dba GEO CALIFORNIA,
8 INC. and GEO CORRECTIONS AND
DETENTION, LLC

9 UNITED STATES DISTRICT COURT
10 EASTERN DISTRICT OF CALIFORNIA

11 JOSEPHINE HERNANDEZ,
12 Plaintiff,

13 v.

14 THE GEO GROUP, INC. dba GEO
15 CALIFORNIA, INC., a Florida
16 corporation; GEO CORRECTIONS
AND DETENTION, LLC, a Florida
17 limited liability company; and DOES 1
through 20, inclusive,
18 Defendants.

Case No. 1:15 cv 01813 - JLT

**JOINT STIPULATION RE
REQUEST TO CONTINUE TRIAL
AND DISCOVERY DATES**

(Doc. 20)

1 Plaintiff Josephine Hernandez and Defendant The GEO Group, Inc. d/b/a GEO
2 California, Inc. and GEO Corrections and Detention, LLC (collectively, the “Parties”)
3 by and through their respective counsel of record hereby stipulate and respectfully
4 request the Court continue the trial and discovery dates in the above-reference matter,
5 as follows:

6 WHEREAS, on February 17, 2016 the Parties filed their Joint Scheduling
7 Report in the above-captioned matter;

8 WHEREAS, on February 25, 2016, the Court issued an Order setting Trial for
9 March 28, 2017 and Pretrial Conference for February 10, 2017, and set the Discovery
10 Deadlines in the above-captioned matter;

11 WHEREAS, the Parties have experienced unexpected delays in discovery in
12 this matter;

13 WHEREAS, Plaintiff’s counsel was diagnosed with an illness and required
14 treatment for the same;

15 WHEREAS, Plaintiff’s continued deposition was unexpectedly cancelled the
16 day before it was to take place as a result of Plaintiff’s move to Sacramento,
17 California. The deposition is currently scheduled for September 23, 2015;

18 WHEREAS, the deposition of Pratrapp Misra was unexpectedly cancelled due to
19 Mr. Misra’s medical emergency. The parties are discussing a potential deposition date
20 in mid-September for Mr. Misra’s deposition;

21 WHEREAS, the Parties have agreed that Plaintiff will participate in an
22 independent medical examination (“IME”); however, Plaintiff’s deposition must be
23 completed prior to the IME to allow Defendants to obtain the relevant testimony,
24 documents and subsequently obtained records related to Plaintiff’s claims for
25 emotional distress damages necessary to allow for an effective and complete IME;

26 WHEREAS, the completion of Plaintiff’s deposition and IME are necessary for
27 the drafting and filing of Defendants’ dispositive motion;

28

1 WHEREAS, Plaintiff wishes to complete the deposition of several key
2 witnesses, including Pratrapp Misra, Warden Wanda Wilson, and the PMK of
3 Defendant regarding the decision to terminate Plaintiff, but has not been able to as a
4 result of the unexpected delays stated above;

5 WHEREAS, the Discovery Deadline is currently set for October 31, 2016 for
6 non-expert discovery and December 5, 2016 for expert discovery, and the Parties
7 anticipate they will not be able to complete all necessary discovery prior to those
8 dates;

9 WHEREAS, the Parties have reviewed their trial calendars and both are
10 available to begin trial on June 1, 2017, or a date shortly thereafter convenient with
11 the Court;

12 THEREFORE, the Parties respectfully request that the Court continue the
13 current dates as follows:

Matter	Current Date	Requested Continued Date	Court Order
Non-Expert Discovery Deadline	10/31/2016	1/26/2017	
Expert Discovery Deadline	12/5/2016	3/6/2017	
Non-Dispositive Motion Filing Deadline	11/14/2016	2/13/2017	
Non-Dispositive Motion Hearing Deadline	12/12/2016	3/13/2017	
Dispositive Motion Filing Deadline	11/14/2016	3/13/2017	
Dispositive Motion Hearing Deadline	12/29/2016	4/10/2017	
Pre-Trial Conference	2/10/2017	4/17/2017	
Trial (jury) (court): Estimated length: 15-20	3/28/2017	6/1/2017	

1 days

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5 Dated: September 1, 2016

6 /s/ **Carlos Jimenez**
7 CARLOS JIMENEZ
8 JESSICA S. KANG
9 LITTLER MENDELSON, P.C.
10 On Behalf of Defendants
11 THE GEO GROUP, INC. DBA GEO
12 CALIFORNIA, INC. AND GEO
13 CORRECTIONS AND DETENTION, LLC

14 Dated: September 1, 2016



15 ALLYSON K. THOMPSON
16 ALIS M. MOON
17 KRING & CHUNG, LLP
18 On Behalf of Plaintiff
19 JOSEPHINE HERNANDEZ

20 **ORDER**

21 Based upon the stipulation of counsel and the unforeseen difficulties that have arisen in
22 completing discovery, the Court **ORDERS** the case schedule amended as follows:

- 23 1. All non-expert discovery SHALL be completed by 1/26/17;
- 24 2. All expert discovery SHALL be completed by 3/6/17;
- 25 3. The parties SHALL disclose their experts no later than 2/3/17 and any rebuttal
26 experts by 3/17/17;
- 27 4. Any nondispositive motion SHALL be filed no later than 2/13/17 and heard no later
28 than 3/13/17;
5. Any dispositive motion SHALL be filed no later than 3/13/17 and heard no later than
4/17/17;

