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THE GEO GROUP, INC. dba GEO CALIFORNIA,
INC. and GEO CORRECTIONS AND
DETENTION, LLC

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

JOSEPHINE HERNANDEZ,

Plaintiff,

V.

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

Defendants.

Case No. 1:15 cv 01813 - JLT

*ASSIGNED FOR ALL PURPOSE TO
HON. JENNIFER L. THURSTON*

JOINT STIPULATION REQUEST TO CONTINUE DISCOVERY AND EXPERT DISCOVERY DATES

(DOC. 26)

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 discovery cut-off and expert discovery cut-off dates in
5 the above-reference matter, as follows:

6 WHEREAS, on September 7, 2016, pursuant to the stipulation of the Parties,
7 the Court continued the date of trial to July 24, 2017, and set the deadline to complete
8 non-expert discovery for January 26, 2017 and the deadline to complete expert
9 discovery for March 6, 2017 (Dkt. 22);

10 WHEREAS, the Court, on its own motion, continued the pretrial conference to
11 July 14, 2017 and the trial to July 24, 2017, to accommodate the Court’s schedule
12 (Dkt. 23.);

13 WHEREAS, the Parties have experienced unexpected delays in discovery in
14 this matter largely due to an unexpected personnel matter with Defendant’s Counsel;

15 WHEREAS, Defendants wish to take the depositions of Plaintiff’s alleged
16 treating physicians for emotional distress allegedly suffered by Plaintiff; however, due
17 to the upcoming holidays and unexpected delays stated above, the depositions may not
18 be completed prior to January 26, 2017;

19 WHEREAS, the Parties have agreed that Plaintiff will participate in an
20 independent medical examination (“IME”), which is currently set for January 9, 2017;

21 WHEREAS, the completion of the depositions of Plaintiff’s alleged treating
22 physicians and the IME are necessary for the drafting and filing of Defendants’
23 dispositive motion;

24 WHEREAS, the prior case schedule set the deadline for the Parties to disclose
25 rebuttal expert witnesses by March 17, 2017, which is after the deadline, March 6,
26 2017, to complete expert discovery;

27 WHEREAS, the Parties will not be prejudiced by a continuation of the
28 discovery and expert discovery cut-off dates in light of the continuation of trial;

1
2 THEREFORE, the Parties respectfully request that the Court continue the
3 current dates as follows:

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- 5 • Discovery cut-off date: February 28, 2017;
 - 6 • Expert Discovery cut-off date: April 6, 2017;
 - 7 • The Parties shall disclose their experts no later than March 3, 2017, and
any rebuttal experts by March 17, 2017.
 - 8 • Non-Dispositive Motion Filing Deadline: March 13, 2017;
 - 9 • Non-Dispositive Motion Hearing Deadline: April 10, 2017.

10 Dated: December 22, 2016
11

12 */s/ Jessica S. Kang*
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14 CARLOS JIMENEZ
15 JESSICA S. KANG
16 LITTLER MENDELSON, P.C.
17 Attorneys for Defendants
18 THE GEO GROUP, INC. DBA GEO
19 CALIFORNIA, INC. AND
20 GEO CORRECTIONS AND DETENTION,
21 LLC
22

23 Dated: December 22, 2016
24

25 */s/ Alis M Moon*
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27 ALLYSON K. THOMPSON
28 ALIS M. MOON
KRING & CHUNG, LLP
On Behalf of Plaintiff
JOSEPHINE HERNANDEZ
29

30 ORDER

31 The stipulation is **GRANTED**. The amended case schedule requires:
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- 33 1. All non-expert discovery **SHALL** be completed no later than February
28, 2017;
- 34 2. All expert discovery **SHALL** be completed no later than April 6, 2017;
- 35 3.

1 3. The Parties **SHALL** disclose their experts no later than March 3, 2017,
2 and any rebuttal experts by March 17, 2017;

3 4. Any non-dispositive motion **SHALL** be filed no later than March 13,
4 2017 and heard no later than April 10, 2017.

5 **The Court does not contemplate receiving any further requests for**
6 **amendment to the case schedule nor does it contemplate granting any further**
7 **requests for amendment to the case schedule.**

8 IT IS SO ORDERED.
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10 Dated: December 22, 2016

11 _____
12 /s/ **Jennifer L. Thurston**
13 UNITED STATES MAGISTRATE JUDGE
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