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

15 UNITED STATES DISTRICT COURT  
16 EASTERN DISTRICT OF CALIFORNIA

17 JOSEPHINE HERNANDEZ,  
18 Plaintiff,

19 v.

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

26 Defendants.

Case No. 1:15 cv 01813 - JLT

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

**JOINT STIPULATION RE  
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:

- 4 • Discovery cut-off date: February 28, 2017;  
5 • Expert Discovery cut-off date: April 6, 2017;  
6 • The Parties shall disclose their experts no later than March 3, 2017, and  
7 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  
13 /s/ Jessica S. Kang  
CARLOS JIMENEZ  
JESSICA S. KANG  
LITTLER MENDELSON, P.C.  
Attorneys for Defendants  
THE GEO GROUP, INC. DBA GEO  
16 CALIFORNIA, INC. AND  
GEO CORRECTIONS AND DETENTION,  
17 LLC

18 Dated: December 22, 2016

19 /s/ Alis M Moon  
ALLYSON K. THOMPSON  
20 ALIS M. MOON  
KRING & CHUNG, LLP  
21 On Behalf of Plaintiff  
JOSEPHINE HERNANDEZ  
22

23 **ORDER**

24 The stipulation is **GRANTED**. The amended case schedule requires:

- 25 1. All non-expert discovery **SHALL** be completed no later than February  
26 28, 2017;  
27 2. All expert discovery **SHALL** be completed no later than April 6, 2017;  
28

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  
9 IT IS SO ORDERED.

10          Dated: December 22, 2016

/s/ Jennifer L. Thurston  
UNITED STATES MAGISTRATE JUDGE