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9	Attorneys for Defendant, LAWRENCE FACTOR, INC.								
10									
11	UNITED STATES DISTRICT COURT								
12	EASTERN DISTRICT OF CALIFORNIA, FRESNO DIVISION								
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14	STEPHANIE TENNISON,	CASE NO. 1:16-CV-00247-LJO-JLT							
15	Plaintiff,	ORDER GRANTING STIPULATION TO							
16	VS.	EXTEND THE NON-EXPERT DISCOVERY CUT-OFF DEADLINE FOR							
17	LAWRENCE FACTOR, INC.; LAB ON	THE LIMITED PURPOSE OF TAKING THE DEPOSITION OF KATHLEEN							
18	LOCALE; X-ZAM LABORATORIES; and DOES 1-25,	MURPHY, M.D.							
19	Defendants.	(Doc. 29)							
20									
21	TO THIS HONORABLE COURT:								
22	Plaintiff STEPHANIE TENNISON ("Tennison") and Defendant LAWRENCE FACTOR,								
23	INC. ("Lawrence Factor") (hereinafter "the Parties"), by and through their respective attorneys of								
24	record, hereby stipulate as follows:								
25	1. Tennison filed the present action on or about February 22, 2016, alleging four								
26	causes of action: (1) Strict product liability; (2) general negligence; (3) breach of implied								
27	warranty; and (4) breach of express warrant.								
28	4823-0784-9800.1	1 1:16-CV-00247-LJO-JL							

LIMITED PURPOSE OF TAKING THE DEPOSITION OF KATHLEEN MURPHY, M.D.

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2.	On	August	5, 2016,	this	Court	entered	a Pre	etrial	Sch	edulin	g Or	der.	Th	e Pretr	ial
Scheduling	Order	set the	non-expe	ert di	scover	y cut-off	f on i	May	30,	2017	and	trial	on	March	6,
2018															

- 3. On May 8, 2017, Lawrence Factor noticed the deposition of Kathleen Murphy, M.D. ("Dr. Murphy"), for May 22, 2017. Dr. Murphy is one of Tennison's treating providers.
- 4. Subsequent to Lawrence Factor noticing Dr. Murphy's deposition, Dr. Murphy had a scheduling conflict arise. In order to accommodate Dr. Murphy's schedule, the Parties agreed to continue Dr. Murphy's deposition to June 12, 2017. Dr. Murphy has confirmed her availability for June 12, 2017. Subsequent to this confirmation, Lawrence Factor served an amended notice of deposition of Dr. Murphy for June 12, 2017.
- 5. The Parties have been actively litigating this case, taking numerous non-expert depositions during the month of May. The Parties have traveled to Bakersfield, California, Modesto, California, and Miami, Florida in order to take and complete said non-expert depositions.
- 6. The Parties have made no prior request to extend the non-expert discovery cut-off deadline.
- 7. To accommodate Dr. Murphy, the Parties stipulate, subject to approval of the Court, that the Non Expert Cut-Off for the limited purpose of taking the deposition Dr. Murphy is extended until June 12, 2017. All other dates set forth in the Pretrial Scheduling Order remain unchanged.

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1	8. This stipulation and the request herein will not prejudice any of the Parties, and is
2	not made for the purposes of delay or harassment.
3	Pursuant to Eastern District of California local rule 131(e), counsel for Tennison has
4	authorized counsel for Lawrence Factor, Inc. to electronically sign and submit this joint
5	stipulation.
6	IT IS SO STIPULATED
7	DATED: May 23, 2017 LEWIS BRISBOIS BISGAARD & SMITH LLP
8	/s/ Steven E. Meyer
9	Steven E. Meyer Attorneys for Defendant
10	LAWRÉNCE FACTOR INC.
11	DATED: May 23, 2017 LAW OFFICES OF YOUNG WOOLDRIDGE,
12	LLP
13	/s/ Greg A. Muir Greg A. Muir
14	Attorneys for Plaintiff STEPHANIE TENNISON
15	ODDED
16	<u>ORDER</u>
17	IT IS SO ORDERED.
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19	Dated: May 23, 2017 /s/ Jennifer L. Thurston UNITED STATES MAGISTRATE JUDGE
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