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8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA

10 KULVEER K. GHUMAN,
11 Plaintiff,
12 v.
13 UNITED STATES OF AMERICA
14 Defendant.

CASE NO. 1:16-CV-1443-DAD-JLT

**STIPULATION AND [PROPOSED] ORDER
TO CONTINUE SETTLEMENT
CONFERENCE AND DISCOVERY
DEADLINES**

(Doc. 11)

15
16 Plaintiff Kulveer K. Ghuman and Defendant United States of America respectfully request that
17 the Court continue the settlement conference currently scheduled for August 4, 2017 at 1:30 p.m. to
18 **September 8, 2017**. This will give the parties an opportunity to finish some key discovery that will
19 render settlement discussions more productive. Rescheduling the settlement conference for this date
20 would make Plaintiff's written itemization of damages and meaningful settlement demand that includes
21 a brief explanation of why such a settlement is appropriate due to Defendant on **August 18, 2017**.
22 Defendant's response of either acceptance or a meaningful counteroffer that includes a brief explanation
23 of why such a settlement is appropriate would be due to Plaintiff on **August 25, 2017**. The parties
24 would have to submit confidential settlement conference statements by email to Judge Thurston by
25 **September 1, 2017**. Defendant also requests that the Court permit agency counsel representing the
26 Department of Health and Human Services, who is located in the District of Columbia, to attend the
27 settlement conference by telephone.
28

1 Because of scheduling conflicts, the parties also respectfully request the following minor
2 adjustments to the case schedule. These adjustments will not affect the trial and pretrial dates set by the
3 Court.

<u>Event</u>	<u>Current Date</u>	<u>Proposed New Date</u>
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Respectfully submitted,
PHILLIP A. TALBERT
United States Attorney

Dated: June 15, 2017

By: /s/ Victoria L. Boesch
VICTORIA L. BOESCH
Assistant United States Attorney
Attorneys for the United States

LEVY LAW FIRM

Dated: June 15, 2017

By: /s/ Dane Levy (authorized 6/15/17)
DANE LEVY
Dane Levy, Esq.
Bjorn Burlin, Esq.
Levy Law Firm
Attorneys for Plaintiff Kulveer K. Ghuman

ORDER

The stipulation to amend the case schedule is **GRANTED in PART** as follows:

1. All non-expert discovery **SHALL** be completed **no later than August 11, 2017;**
2. Plaintiff **SHALL** disclose his experts **no later than August 25, 2017** and Defendant **SHALL** disclose its experts **no later than September 22, 2017.** Plaintiff **SHALL** disclose rebuttal experts, if any, **no later than October 13, 2017;**
3. The settlement conference is **CONTINUED** to **January 8, 2018** at 9:30 a.m. The

1 deadlines set forth in the scheduling order (Doc. 8 at 6-7) remain in effect.

2
3 IT IS SO ORDERED.

4 Dated: June 19, 2017

/s/ Jennifer L. Thurston
UNITED STATES MAGISTRATE JUDGE