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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

GERALD OWINGS,

 Plaintiffs,

 vs.

FCA US LLC; CHRYSLER GROUP LLC;
CHRYSLER LLC; and DOES 1 through
50, inclusive,

 Defendants.

Case No.: 1:16-cv-01745-LJO-EPG

STIPULATION AND ORDER TO
EXTEND DEADLINES

Plaintiffs, GERALD OWINGS and FAYE OWINGS, and Defendant, FCA US LLC, through their undersigned attorneys, hereby stipulate that good cause exists, and respectfully request, for the Court to enter an order extending certain deadlines in the Court’s Scheduling Order (ECF No. 6) in order to accommodate the schedules of multiple witnesses, intervening holidays and counsel’s calendar. Percipient witness Jaime Lopez indicated he will be out of the country from December 4, 2017 through January 5, 2018. His deposition was previously noticed to occur on December 7, 2017. Plaintiff Gerald Owings, whose deposition was noticed to occur on December 5, 2017, is also unavailable for deposition until January 2018. The brief continuance requested by the parties will promote the interests of justice and allow the parties appropriate time to properly prepare this case and complete outstanding discovery. The parties request the following dates be continued:

- (1) Nonexpert Discovery Cutoff from December 15, 2017 to January 31, 2018;
- (2) Expert Disclosure from January 16, 2018 to February 16, 2018;
- (3) Rebuttal Expert Disclosure from February 16, 2018 to March 16, 2018; and

1 (4) Expert Discovery Cutoff from March 16, 2018 to April 16, 2018.

2 The parties do not request any modification of the dispositive motion filing deadline,
3 pretrial conference or trial date at this time.

4 * * *

5 Respectfully submitted.

6 DATED: Dec. 5, 2017

**WAGNER, JONES, KOPFMAN
& ARTENIAN LLP**

7
8 By: /s/ Nicholas Wagner
9 Attorneys for Plaintiff

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11 DATED: Dec. 5, 2017

**HAWKINS PARNELL THACKSTON
& YOUNG**

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13 By: /s/ Ryan E. Cosgrove¹
14 Attorneys for Defendant

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¹ Permission to affix signature granted by email on December 5, 2017.

ORDER

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2 Good cause appearing, the requested modifications are SO ORDERED. The remainder
3 of the scheduling order is unchanged.

4 IT IS SO ORDERED.

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6 Dated: **December 8, 2017**

 /s/ Eric P. Groj
7 UNITED STATES MAGISTRATE JUDGE