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17 Attorneys for Defendant,
 18 DOLLAR GENERAL CORP.

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

MANNING & KASS
 ELLROD, RAMIREZ, TRESTER LLP
 ATTORNEYS AT LAW

21 JOHN STINCHECUM; PETRA
 22 STINCHECUM,
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 24 Plaintiffs,
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 26 v.
 27 DOLLAR GENERAL CORP. and DOES 1 to
 28 25, Inclusive,
 Defendants.

Case No. 1:17-cv-00240-DAD-MJS

**STIPULATION AND ORDER TO
 EXTEND DEADLINE FOR EXPERT
 WITNESS DISCLOSURE, COMPLETION
 OF EXPERT DISCOVERY, AND
 CONTINUANCE OF SETTLEMENT
 CONFERENCE**

State Action Filed: December 5, 2016
 Date of Removal: February 17, 2017

Settlement Conf: April 5, 2018
 10:00AM Fresno
 Courtroom 6

It is hereby STIPULATED by and between Plaintiffs JOHN STINCHECUM and PETRA STINCHECUM (hereinafter "Plaintiffs") and Defendant DOLLAR GENERAL CORP. (hereinafter "Defendant"), by and through their counsel of record, as follows:

The Jury Trial in this matter is presently scheduled for September 11, 2018 at 8:30 a.m. in

1 Courtroom 5 , before the Honorable Dale A. Drozd, United States District Court Judge.

2 The Pretrial Conference in this matter is presently scheduled for July 9, 2018, at 1:30 p.m.,
3 in Courtroom 5 , before the Honorable Dale A. Drozd, United States District Court Judge.

4 Parties have conferred and agreed that Good Cause exists for the Expert Witness
5 Disclosure set for December 5, 2017, and the Supplemental/Rebuttal Disclosure set for December
6 15, 2017, be continued as such dates would be premature as additional discovery, including a
7 Defense Medical Examination, must be completed for the retention and disclosure of expert
8 witnesses and reports. With the aforementioned, the parties and conferred and agreed that the
9 settlement conference currently scheduled for January 26, 2018 would be unsuccessful due to the
10 need to complete the aforementioned discovery, including a Defense Medical Examination.

11 NOW, THEREFORE, IT IS HEREBY AGREED AND STIPULATED by Plaintiffs and
12 Defendants, by and through their respective counsel, to request an Order that:

- 13 1. The Expert Witness Disclosure be extended from December 5, 2017 to February
14 16, 2018;
- 15 2. The Supplemental/Rebuttal Expert Disclosure be extended from December 15,
16 2018 to February 26, 2018;
- 17 3. Expert Discovery Deadline be extended from March 12, 2018 to April 13, 2018.
- 18 4. The Settlement Conference in this matter, currently scheduled for January 26,
19 2018, at 10:30 a.m. in Courtroom 6, before the Honorable Magistrate Judge Michael J. Seng be
20 continued sixty days.

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1 DATED: January 17, 2018

**MANNING & KASS
ELLROD, RAMIREZ, TRESTER LLP**

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4 By: /s/ Jeffrey M. Lenkov
5 Jeffrey M. Lenkov, Esq.
6 David V. Roth, Esq.
7 Attorneys for Defendant,
8 DOLLAR GENERAL CORP.

WELEBIR TIERNEY, APLC.

8 DATED: January 12, 2018

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11 By: /s/ James F. Tierney
12 James F. Tierney, Esq.
13 Douglas F. Welebir, Esq.
14 Attorneys for Plaintiffs
15 JOHN STINCHECUM and PETRA
16 STINCHECUM

15 **ORDER**

- 16 1. The Expert Witness Disclosure be extended from December 5, 2017 to February
17 16, 2018;
- 18 2. The Supplemental/Rebuttal Expert Disclosure be extended from December 15,
19 2018 to February 26, 2018;
- 20 3. Expert Discovery Deadline be extended from March 12, 2018 to April 13, 2018.
- 21 4. The Settlement Conference in this matter, currently scheduled for January 26,
22 2018, be continued until 10:00 AM April 5, 2018, in Courtroom 6, Fresno, before
23 the Magistrate Judge Michael J. Seng.

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25 IT IS SO ORDERED.

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27 Dated: January 18, 2018

 /s/ Michael J. Seng
28 UNITED STATES MAGISTRATE JUDGE