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12  
13 **UNITED STATES DISTRICT COURT**  
14 **EASTERN DISTRICT OF CALIFORNIA**  
15

16 JOHN STINCHECUM, an individual,

17 Plaintiffs,

18 v.

19 DOLLAR GENERAL CORP. and DOES 1 to  
20 25, Inclusive,

21 Defendants.

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

**STIPULATION AND ORDER TO  
EXTEND DEADLINE FOR NON-EXPERT  
DISCOVERY CUTOFF**

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

23  
24 It is hereby STIPULATED by and between Plaintiff JOHN STINCHECUM (hereinafter  
25 “Plaintiff”) and Defendant DOLLAR GENERAL CORP. (hereinafter “Defendant”), by and  
26 through their counsel of record, as follows:

27 The Jury Trial in this matter is presently scheduled for September 11, 2018 at 8:30 a.m. in  
28 Courtroom 5, before the Honorable Dale A. Drozd, United States District Court Judge.

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

Parties have conferred and agreed that Good Cause exists for the Non-Expert Discovery Cutoff set for March 2, 2018 to be continued as such dates would be premature as additional discovery, including a Depositions of Defendant's Person(s) Most Knowledgeable, and Defense Medical Examination, must be completed in order for the parties to be prepared to proceed to trial.

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

1. Non-Expert Discovery Deadline be extended from March 2, 2018 to May 15, 2018.

DATED: February 6, 2018

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

By:           /S/ Alexandra R. Rambis, Esq.  
Jeffrey M. Lenkov, Esq.  
David V. Roth, Esq.  
Alexandra R. Rambis, Esq.  
Attorneys for Defendant,  
DOLLAR GENERAL CORP.

DATED: February 6, 2018

**WELEBIR TIERNEY, APLC.**

By:           /S/ James F. Tierney, Esq.  
James F. Tierney, Esq.  
Douglas F. Welebir, Esq.  
Attorneys for Plaintiffs  
JOHN STINCHECUM and PETRA  
STINCHECUM

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**ORDER**

Pursuant to the stipulation of the parties, it is hereby ORDERED that the non-Expert Discovery Deadline in **Case No. 1:17-cv-00240-DAD-MJS** is extended from March 2, 2018 to May 15, 2018.

IT IS SO ORDERED.

Dated: February 9, 2018

/s/ Michael J. Seng  
UNITED STATES MAGISTRATE JUDGE

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