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21 Attorneys for Defendant
22 UNION PACIFIC RAILROAD COMPANY

23 **IN THE UNITED STATES DISTRICT COURT**
24 **FOR THE EASTERN DISTRICT OF CALIFORNIA**

25 JOHNNY GRIFFIN
26 Plaintiff,

27 vs.

28 UNION PACIFIC RAILROAD COMPANY,
and DOES 1 through 10, inclusive
Defendants.

Case No.: 1:17-cv-00384-LJO-JLT

**JOINT STIPULATION REGARDING
CONTINUANCE OF TRIAL AND
RELATED DATES; [PROPOSED]
ORDER**

(Doc. 53)

Plaintiff JOHNNY GRIFFIN and Defendant UNION PACIFIC RAILROAD COMPANY
by and through respective counsel, hereby submit the following stipulation to continue trial

1 and related dates. After meeting and conferring, the parties hereby stipulate to the
2 following:

- 3
4 1. Trial date of January 28, 2019 at 8:30 a.m., pursuant to section D of the
5 Pretrial Order (DOC 33), be vacated and continued to February 12, 2019 at
6 8:30 a.m.;
- 7 2. January 11, 2019 date to submit final lists of respective exhibits, pursuant to
8 section M.2. of the Pretrial Order (DOC 33), be vacated and continued to
9 January 25, 2019;
- 10 3. January 25, 2019 date to submit all pre-marked trial exhibits to the courtroom
11 deputy, pursuant to section M.3. of the Pretrial Order (DOC 33), be vacated
12 and continued to February 8, 2019;
- 13 4. January 11, 2019 date to submit trial briefs, pursuant to section N of the
14 Pretrial Order (DOC 33), be vacated and continued to January 25, 2019;
- 15 5. January 11, 2019 date to submit proposed jury *voir dire*, pursuant to section
16 U of the Pretrial Order (DOC 33), be vacated and continued to January 25,
17 2019;
- 18 6. January 11, 2019 date to submit jury instructions and verdict form, pursuant
19 to section V of the Pretrial Order (DOC 33), be vacated and continued to
20 January 25, 2019;
- 21 7. Defendant's expert witness, Dr. Sassan Keshavarzi, will be permitted to
22 testify via teleconference, if necessary.

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DATED: January 9, 2019

RODRIGUEZ & ASSOCIATES

By: /s/ Daniel Turek
DANIEL RODRIGUEZ
DANIEL TUREK
Attorneys for Plaintiff Johnny Griffin

DATED: January 9, 2019

MURPHY, CAMPBELL, ALLISTON, & QUINN

By: /s/ Mariel Covarrubias
STEPHANIE L. QUINN
MARIEL COVARRUBIAS
Attorneys for Defendant Union Pacific Railroad Co.

1 **[PROPOSED] ORDER**

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3 Based on the Stipulation of the Parties, the Court **ORDERS**:

- 4
- 5 1. The trial is continued to February 12, 2019 at 8:30 a.m.;
 - 6 2. The parties **SHALL** file their final exhibit list (Doc. 33 at 10) by January 25, 2019;
 - 7 3. The parties **SHALL** submit the pre-marked trial exhibit binders to the courtroom deputy
8 by February 8, 2019;
 - 9 4. The parties **SHALL** may file trial briefs no later than January 25, 2019;
 - 10 5. The parties **SHALL** file proposed jury *voir dire* no later than January 25, 2019;
 - 11 6. The parties **SHALL** file their proposed jury instructions and verdict form no later than
12 January 25, 2019;
 - 13 7. Defendant's expert witness, Dr. Sassan Keshavarzi, will be permitted to testify via
14 teleconference or videoconference, if necessary. However, defense counsel **SHALL**
15 contact Courtroom Deputy Clerk, Susan Hall, at (661)-326-6620 or
16 Shall@caed.uscourts.gov. to arrange a test of the teleconference or videoconference no
17 later than January 18, 2019.

18 IT IS SO ORDERED.

19
20 Dated: January 10, 2019

/s/ Jennifer L. Thurston
UNITED STATES MAGISTRATE JUDGE