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12 Attorneys for Plaintiff FATEMEH SANIEFAR  
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15 UNITED STATES DISTRICT COURT  
16 EASTERN DISTRICT OF CALIFORNIA  
17 FRESNO DIVISION

18 FATEMEH SANIEFAR,

19 Plaintiff,

20 vs.

21 RONALD D. MOORE, TANYA E. MOORE,  
KENNETH RANDOLPH MOORE,  
22 MAREJKA SACKS, ELMER LEROY FALK,  
ZACHARY M. BEST, MOORE LAW FIRM,  
23 a California Professional Corporation,  
MISSION LAW FIRM, a California  
24 Professional Corporation, GEOSHUA  
LEVINSON, RICK D. MOORE, WEST  
25 COAST CASP AND ADA SERVICES, a  
California Corporation, RONNY LORETO,  
26 and DOES 1 THROUGH 100, inclusive,

27 Defendants.  
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Case No. 1:17-cv-00823-LJO-BAM

JOINT STIPULATION AND ORDER TO  
MODIFY SCHEDULING ORDER

District Judge: Hon. Lawrence J. O'Neil

Magistrate Judge: Hon. Barbara A. McAuliffe

1 Plaintiff Fatemeh Saniefar and Defendants Ronald D. Moore, Tanya E. Moore,  
2 Kenneth Randolph Moore, Marejka Sacks, Zachary M. Best, Moore Law Firm, Mission Law  
3 Firm, Geoshua Levinson, Rick D. Moore, West Coast CASp and ADA Services, and Ronny  
4 Loreto, by and through their undersigned counsel, hereby submit the following Stipulation  
5 Modifying Scheduling Order to modify the Court's Scheduling Order issued on July 24, 2018 for  
6 good cause for the stated reasons below.

7 WHEREAS, the Court issued a Scheduling Order on July 24, 2018 with the following  
8 deadlines:

9 Expert Disclosures - May 17, 2019;

10 Non-expert Discovery Cutoff - June 7, 2019;

11 Supplemental Expert Disclosures - June 21, 2019;

12 Expert Discovery Cutoff - August 9, 2019;

13 Pretrial Motion Filing Deadline - October 4, 2019;

14 Pretrial Conference - March 3, 2020; and

15 Trial - May 5, 2020;

16 Whereas, pursuant to the Court's order of April 23, 2019, Defendants have been ordered  
17 to produce a privilege log and unprivileged and responsive documents to Plaintiff by May 23,  
18 2019;

19 Whereas, after Defendants produce documents and a privilege log as ordered by April  
20 23, 2019, Plaintiff intends to pursue a motion to compel based on application of the crime-fraud  
21 exception;

22 Whereas, the Parties are still in the midst of conducting fact discovery;

23 Whereas, because of ongoing discovery, under the Court's current Scheduling Order, the  
24 Parties will be unable to: (1) provide their expert disclosures by May 17, 2019; (2) finish fact  
25 discovery by June 7, 2019; (3) provide supplemental expert disclosures by June 21, 2019; and  
26 finish expert discovery by August 9, 2019.

27 THEREFORE, the parties agree that good cause exists to extend the following deadlines  
28 as provided below:

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Expert Disclosures - August 16, 2019;  
Non-expert Discovery Cutoff - September 6, 2019;  
Supplemental Expert Disclosures - September 13, 2019;  
Expert Discovery Cutoff – October 11, 2019;  
Pretrial Motion Filing Deadline – November 22, 2019;

All remaining dates issued in the July 24, 2018 Scheduling Order are to remain unchanged, or to other dates that the Court deems appropriate based on the Court’s scheduling preference.

Respectfully submitted,

DATED: May 6, 2019

SANIEFAR LAW  
SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

*/s/ Moji Saniefar*

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MOJI SANIEFAR  
RAYMOND C. MARSHALL  
GREGORY F. HURLEY  
WHITNEY A. HODGES  
Attorneys for Plaintiff Fatemeh Saniefar

DATED: May 6, 2019

GORDON REES SCULLY MANSUKHANI, LLP

*/s/ Steven R. Inouye*

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Roger M. Mansukhani  
David L. Jones  
Steven R. Inouye  
Attorneys for Defendants  
Moore Law Firm, A.P.C., Tanya E. Moore, Kenneth Randolph Moore, Ronald D. Moore, Zachery M. Best, Marejka Sacks, Mission Law Firm, A.P.C., Elmer Leroy Falk, Geoshua Levinson, Rick D. Moore, West Coast CASp and ADA Services, and Ronny Loreto

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**ORDER**

Based on the Joint Stipulation of the parties, and good cause appearing therefor, **IT IS ORDERED** that the Scheduling Order issued on July 24, 2018 be modified as follows:

Expert Disclosures - August 16, 2019;

Non-expert Discovery Cutoff - September 6, 2019;

Supplemental Expert Disclosures - September 13, 2019;

Expert Discovery Cutoff – October 11, 2019;

Pretrial Motion Filing Deadline – November 22, 2019;

All remaining dates issued in the July 24, 2018 Scheduling Order are to remain unchanged.

IT IS SO ORDERED.

Dated: May 6, 2019

/s/ Barbara A. McAuliffe  
UNITED STATES MAGISTRATE JUDGE