

1 Dylan B. Carp (State Bar No. 196846)  
Angel R. Sevilla (State Bar No. 239072)  
2 Stephanie T. Yang (State Bar No. 280006)  
JACKSON LEWIS P.C.  
3 50 California Street, 9th Floor  
San Francisco, California 94111  
4 Telephone: (415) 394-9400  
Facsimile: (415) 394-9401  
5 Email: [carpd@jacksonlewis.com](mailto:carpd@jacksonlewis.com)  
[angel.sevilla@jacksonlewis.com](mailto:angel.sevilla@jacksonlewis.com)  
6 [stephanie.yang@jacksonlewis.com](mailto:stephanie.yang@jacksonlewis.com)

7 Attorneys for Defendant  
NEXSTAR BROADCASTING, INC.,  
8

9 UNITED STATES DISTRICT COURT  
10 EASTERN DISTRICT OF CALIFORNIA  
11

12 PAULA GORDON, an individual,  
13

14 Plaintiff,

15 v.

16 NEXSTAR BROADCASTING, INC.  
a business entity, form unknown; KGET-TV  
17 17, a business entity, form unknown; The CW  
NETWORK, LLC, a business entity, form  
unknown; TELEMUNDO 17.3, a business  
18 entity, form unknown; ERIK MENDOZA, an  
individual; and DOES 1 through 100, inclusive  
19

20 Defendants.  
21

Case No. 1:18-cv-00007-DAD-JLT

**ORDER GRANTING STIPULATION  
TO AMEND THE CASE SCHEDULE**  
(Doc. 77)

22 To the Honorable Court:

23 Pursuant to this Court's Scheduling Order (Doc 58), the Parties, by stipulation, request an extension  
24 of the following discovery deadlines:

- 25 • Fact Discovery Cutoff (solely for purposes of conducting the deposition and/or continuation  
26 of the deposition of two third party witnesses): From February 15, 2019 to  
27 February 22, 2019 to accommodate the availability of third party witness Adam Chase, a former  
28 Nexstar manager, who resides out of state and is only available for deposition on

1 February 18, 2019, and to complete the deposition of third party witness Allison Underwood, an  
2 outside investigator retained by Nexstar, which commenced on January 30 but could not be  
3 completed or rescheduled prior to the current February 15 discovery cutoff due to the schedules of  
4 the witness, her counsel and counsel for the parties. (Note: To the extent further motion practice  
5 is required with respect to Ms. Underwood, the Parties anticipate that a third deposition session  
6 may be required for Ms. Underwood.)

7 • Expert Witness Disclosure: From March 1, 2019 to April 1, 2019, to accommodate the  
8 availability of Dr. Delia Silva to conduct a mental status examination of the Plaintiff.

9 • Rebuttal Expert Witness Disclosure: From March 22, 2019 to April 22, 2019

10 • Expert Discovery Cutoff: From April 12, 2019 to May 13, 2019 (May 12 is a Sunday).

11 Good cause exists to grant the stipulation, as the Parties' discovery timeline was constrained by the  
12 availability of a third party witness who resides out of state, by the inclement weather preventing  
13 the Parties' completion of Plaintiff's deposition prior to January 2019, the inability of another third  
14 party witness and her counsel as well as counsel for the parties to find a mutually available date for  
15 all parties for the completion of the deposition prior to the current non-expert discovery cutoff date,  
16 as well as by the proposed medical examiner's lack of availability. This stipulation is supported  
17 by the declaration of Stephanie T. Yang, a copy of which is attached.

18  
19 IT IS SO STIPULATED.

20 Dated: February 1, 2019

JACKSON LEWIS P.C.

21  
22 By: /s/ Stephanie T. Yang

23 Dylan B. Carp  
24 Angel R. Sevilla  
25 Stephanie T. Yang  
26 Attorneys for Defendant  
27 NEXSTAR BROADCASTING, INC.

28 Dated: February 1, 2019

LAW OFFICES OF VICTOR L. GEORGE

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

By: /s/ Wayne C. Smith  
(as authorized on 1/28/19)  
Victor L. George  
Wayne C. Smith  
Attorneys for Plaintiff  
PAUL GORDON

Dated: February 1, 2019 FISH & PHILLIPS LLP

By: /s/ Cheryl Schreck  
(as authorized on 01/28/19)  
Todd B. Scherwin  
Cheryl Schreck  
Attorneys for Defendant  
ERIK MENDOZA

**ORDER**

Based upon the stipulation of the parties and good cause appearing, the Court **ORDERS** the case schedule to be amended as follows:

- 1. The depositions of Adam Chase, Allison Underwood **SHALL** be completed by **February 22, 2019**;
- 2. Experts **SHALL** be disclosed no later than **April 1, 2019**. Rebuttal experts may be disclosed no later than **April 22, 2019** and all expert discovery **SHALL** be completed no later than **May 13, 2019**;
- 3. Any nondispositive motions **SHALL** be filed as soon as the need presents itself but no later than **May 17, 2019** and heard no later than **June 14, 2019**.

IT IS SO ORDERED.

Dated: February 5, 2019 /s/ Jennifer L. Thurston  
UNITED STATES MAGISTRATE JUDGE