| 1 | RACHELLE TAYLOR GOLDEN 295385 | | |
|----------|--|---|--|
| 2 | HATMAKER LAW GROUP A Professional Corporation 7522 N. Galacial Accesses Suita 105 | | |
| 3 | 7522 N. Colonial Avenue, Suite 105 Fresno, California 93711 | | |
| 4 | Telephone: (559) 374-0077 Facsimile: (559) 374-0078 | | |
| 5 | Attorneys for Plaintiffs: MEGAN MCKEON, TINA NEAL, and LAILA NEAL | | |
| 6 | | | |
| 7 | UNITED STATES DISTRICT COURT | | |
| 8 | EASTERN DISTRICT OF CALIFORNIA | | |
| 9 | * * * | | |
| 10 | MEGAN MCKEON; LAILA NEAL, A | NO. 1:18-cv-00358-DAD-BAM | |
| 11 | MINOR BY AND THROUGH HER) | | |
| 12 13 | GUARDIAN AD LITEM, TINA NEAL;) and TINA NEAL, | STIPULATION AND ORDER TO EXTEND DEADLINE FOR MOTION FOR LEAVE TO AMEND | |
| 14 | Plaintiffs,) | PLAINTIFFS' SECOND AMENDED COMPLAINT | |
| 15 | vs. | O 0 - 1-2 - 2 - 1 - 2 | |
| 16 | CENTRAL VALLEY COMMUNITY) | | |
| 17 | SPORTS FOUNDATION, a Non-Profit) Corporation, dba GATEWAY ICE) | | |
| 18 | CENTER; and JEFF BLAIR, an individual;) and DOES 1 through 50, Inclusive, | | |
| 19 | | | |
| 20 | Defendants.) | | |
| 21 | | | |
| 22 | , | | |
| 23 | IT IS HEREBY STIPULATED AND | AGREED, by and between Plaintiffs, MEGAN | |
| 24 | MCKEON, LAILA NEAL by and through her Guardian Ad Litem, Tina Neal, and TINA NEAL | | |
| 25 | and Defendants, CENTRAL VALLEY COMMUNITY SPORTS FOUNDATION and JEFF | | |
| 26 | BLAIR ("Defendants"), through their respective counsel of record, that the Parties mutually | | |
| 27 | agree to extend the deadline as specified in the Court's December 7, 2018 Order "Granting in | | |
| 28 | Part and Denying in Part Plaintiffs' Motion for Leave to File a Second Amended Complaint." | | |
| | | 1 | |

(Document 45.) Plaintiffs' served Request for Production of Documents, Set One, on December 19, 2018, 2 and after Defendants' responses were received on December 28, 2018, counsel for the Parties 3 met and conferred regarding Defendants' responses on February 7, 2019. Counsel for 4 Defendants has requested additional time to provide supplemental responses, rendering the 5 supplemental responses due on March 15, 2019. Therefore, the Parties wish to extend the 6 deadline for Plaintiffs' Motion for Leave to Amend the Second Amended Complaint from 7 8 February 15, 2019 to March 29, 2019. It was also agreed that should the Court wish to contact 9 the Parties to discuss this Stipulation, counsel for the Parties are amiable. HATMAKER LAW GROUP DATED: February 13, 2019 10 A Professional Corporation 11 By: /s/ Rachelle Taylor Golden 12 RACHELLE TAYLOR GOLDEN Attorney for Plaintiffs, MEGAN 13 MCKEON, TINA NEAL and LAILA NEAL 14 15 16 DATED: February 13, 2019 COLEMAN & HOROWITT, LP 17 /s/ Keith White By: 18 DAVID J. WEILAND **KEITH WHITE** 19 Attorney for Defendants, CENTRAL 20 VALLEY COMMUNITY SPORTS FOUNDATION and JEFF BLAIR 21 22 23 24 25 26 27 28

| 1 | ORDER | |
|-----|--|--|
| 2 | Pursuant to the parties' stipulation, and good cause appearing, IT IS HEREBY | |
| 3 | ORDERED that Plaintiffs MEGAN MCKEON, TINA NEAL and LAILA NEAL shall have up | |
| 4 | to and including March 29, 2019, to file a Motion for Leave to Amend the Second Amended | |
| 5 | Complaint. Fed. R. Civ. P. 16(b)(4). All other deadlines in the Scheduling Order issued on | |
| 6 | August 8, 2018, shall remain in effect. (Doc. 34.) | |
| 7 | | |
| 8 | | |
| 9 | IT IS SO ORDERED. | |
| 10 | Dated: February 21, 2019 /s/Barbara A. McAuliffe | |
| 11 | UNITED STATES MAGISTRATE JUDGE | |
| 12 | | |
| 13 | | |
| 14 | | |
| 15 | | |
| 16 | | |
| 17 | | |
| 18 | | |
| 19 | | |
| 20 | | |
| 21 | | |
| 22 | | |
| 23 | | |
| 24 | | |
| 25 | | |
| 26 | | |
| 27 | | |
| 28 | | |
| l l | | |

STIPULATION TO EXTEND DEADLINE

22

28