



<b>Event</b>	<b>Deadline/Date</b>
Motions to Compel	January 7, 2022
Non-expert Discovery	January 25, 2022
Telephonic Discovery and Status Conference	February 14, 2022 Time: 10:00 a.m. <i>At the time of conference, the parties shall dial 1 (888) 251-2909 and enter access code 1024453.</i>
Dispositive Motions	March 25, 2022
Expert Disclosures	August 25, 2022
Rebuttal Expert Disclosures	September 23, 2022
Plaintiff's Pretrial Statement	October 25, 2022
Defendants' Pretrial Statement	November 28, 2022
Telephonic Trial Confirmation Hearing	January 11, 2023 Time: 8:15 a.m. Courtroom 4 (NONE) <i>To participate in this hearing, the parties shall follow the instructions contained in the prior scheduling order. (ECF No. 28, p. 6).</i>

21 Additionally, IT IS FURTHER ORDERED that the order appointing Attorney Lori Rifkin  
22 (ECF No. 30) as limited purpose counsel for Plaintiff is expanded as follows:

- 23 1. The appointment also includes the Rifkin Law Office and any associates that work  
24 with Attorney Lori Rifkin; and
- 25 2. The appointment also extends for the purpose of Attorney Lori Rifkin (and her  
26 firm and any associates working with her) conducting non-expert discovery and  
27 representing Plaintiff in the continued settlement conference set for January 25,  
28 2022.

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2 Because Plaintiff will be represented by counsel through the non-expert discovery  
3 deadline, IT IS FURTHER ORDERED that the following requirements now apply regarding any  
4 potential discovery disputes that arise and any discovery motions that are filed:

5 ***Informal Discovery Conference***

- 6 1. In order to file a discovery motion pursuant to Fed. R. Civ. P. 37, a party must  
7 receive permission from the Court following an informal telephone conference. A  
8 party wishing to schedule such a conference should contact chambers to receive  
9 available dates. The Court will schedule the conference as soon as possible, taking  
10 into consideration the urgency of the issue. Before contacting the Court, the parties  
11 must meet and confer by speaking with each other in person, over the telephone, or  
12 via video in an attempt to resolve the dispute.
- 13 2. Prior to the conference, both parties shall simultaneously submit letters, outlining  
14 their respective positions regarding the dispute. The Court will provide the date the  
15 letters are due at the time the conference is scheduled. Such letters shall be no  
16 longer than three (3) pages single spaced, and may include up to five (5) pages of  
17 exhibits. Letters shall be emailed to Magistrate Judge Grosjean's chambers at  
18 [epgorders@caed.uscourts.gov](mailto:epgorders@caed.uscourts.gov), and not filed on the docket.
- 19 3. At the time of conference, the parties shall dial 1 (888) 251-2909 and enter access  
20 code 1024453. Telephonic conferences will not be on the record and the Court will  
21 not issue a formal ruling at that time. Nevertheless, the Court will attempt to  
22 provide guidance to the parties to narrow or dispose of the dispute. If no resolution  
23 can be reached without formal motion practice, the Court will authorize the filing  
24 of a formal discovery motion.

25 ***Discovery Motions***

- 26 1. If a motion is brought pursuant to Fed. R. Civ. P. 37, after receiving permission  
27 from the Court, the parties must prepare and file a Joint Statement re: Discovery  
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Disagreement (“Joint Statement”) as required by Local Rule 251.2.<sup>1</sup> In scheduling such motions, Magistrate Judge Grosjean may grant applications for an order shortening time pursuant to Local Rule 144(e). Motions to shorten time will only be granted upon a showing of good cause. If a party does not obtain an order shortening time, the notice of motion must comply with Local Rule 251.

2. A Joint Statement, not to exceed twenty-five (25) pages, must be filed seven (7) calendar days before the scheduled hearing date. Prior to the filing of the Joint Statement, the parties must meet and confer as set forth in Local Rule 251(b). In addition to filing the Joint Statement electronically, a copy of the Joint Statement in Word format must be sent to Magistrate Judge Grosjean’s chambers via email to [epgorders@caed.uscourts.gov](mailto:epgorders@caed.uscourts.gov). Courtesy copies for any pleading in excess of twenty-five pages (25) (including exhibits) shall also be delivered to chambers via US mail, or hand delivery, at the time the Joint Statement is electronically filed. Motions may be removed from the Court’s calendar if the Joint Statement is not timely filed, or if courtesy copies are not timely delivered.

All unmodified terms and conditions of the scheduling order (ECF No. 28) remain in full force and effect.

IT IS SO ORDERED.

Dated: June 2, 2021

/s/ Eric P. Grosjean  
UNITED STATES MAGISTRATE JUDGE

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<sup>1</sup> Certain limited exceptions from filing the required Joint Statement are outlined in Local Rule 251(e).