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15
 16 UNITED STATES DISTRICT COURT
 17 EASTERN DISTRICT OF CALIFORNIA
 18 [SACRAMENTO COURTHOUSE]
 19

20 DEBORAH HUNTER

21 Plaintiff,

22 v.

23 INTER-CON SECURITY SYSTEMS,
 24 INC., CARL CARELOCK,

25 Defendants.

Case No. 2:08-CV-00370-JAM-GGH

**REVISED JOINT STIPULATION TO
 AMEND DISCOVERY COMPLETION
 DEADLINE PENDING MEDIATION;
 ORDER THEREON**

Action Filed: February 19, 2008

**JOINT STIPULATION TO AMEND DISCOVERY COMPLETION DEADLINE
 PENDING MEDIATION; [PROPOSED] ORDER**

1 WHEREAS this case was referred to the Voluntary Dispute Resolution
2 Program (“VDRP”) by Stipulation and Order dated March 2, 2009; and

3 WHEREAS the parties met for a mediation conference before Gary Basham,
4 Esq. on June 16, 2009;

5 WHEREAS on August 10, 2009, the VDRP completion report was filed by
6 the VDRP, confirming that the parties did not settle the case;

7 WHEREAS the parties have exchanged discovery in this case and have taken
8 seven depositions between them;

9 WHEREAS the parties agreed to attend a second mediation before Catherine
10 Yanni, Esq. of JAMS, which was originally scheduled for November 17, 2009;

11 **WHEREAS, by agreement between the parties, the mediation before Ms.**
12 **Yanni was rescheduled for January 14, 2010;**

13 WHEREAS, various disputes regarding said discovery have arisen which
14 require the Court’s intervention;

15 WHEREAS, the parties have agreed to postpone the resolution of said
16 discovery disputes until after the completion of the mediation session scheduled for
17 January 14, 2010.

18 WHEREAS by Stipulation and Order dated October 27, 2009, the following
19 case management schedule is now in effect:

- 20 a. Fact discovery shall be completed by January 29, 2010;
- 21 b. Expert reports are due no later than January 29, 2010;
- 22 c. Rebuttal expert reports are due no later than March 1, 2010;
- 23 d. Expert discovery shall be completed by March 31, 2010;
- 24 e. Dispositive motions shall be filed by February 28, 2010 and heard on
25 March 31, 2010 at 9:00am;
- 26 f. Final pretrial conference shall be set for April 30, 2010 at 2pm; and
- 27 g. Trial is scheduled for June 7, 2010 at 9:00 am.

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1 IT IS HEREBY STIPULATED AND AGREED by the attorneys as follows:

2 1. Modifications to the pretrial scheduling order are necessary to allow the
3 parties to defer the resolution of various discovery disputes until after mediation has
4 been completed. Pursuant to Rule 16(b) of the Federal Rules of Civil Procedure, the
5 following case management schedule shall apply:

- 6 a. Fact discovery shall be completed by February 15, 2010;
- 7 b. Expert reports are due no later than February 15, 2010;
- 8 c. Rebuttal expert reports are due no later than March 1, 2010;
- 9 d. Expert discovery shall be completed by March 31, 2010;
- 10 e. Dispositive motions shall be filed by March 10, 2010 and heard on
11 April 7, 2010 at 9:30am;
- 12 f. Final pretrial conference shall be set for April 30, 2010 at 2pm; and
- 13 g. Trial is scheduled for June 7, 2010 at 9:00 am.

14 JUSTICE FIRST, LLP
Attorneys for Plaintiff Deborah Hunter

16 Dated: December 24, 2009 /s/ Jenny Huang
17 Jenny C. Huang
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20 Tel: (510) 628-0695

21 PROSKAUER ROSE LLP
Attorneys for Defendants
22 INTER-CON SECURITY SYSTEMS,
23 INC. and CARL CARELOCK

24 Dated: December 24, 2009 /s/ Jeremy M. Mittman
25 Jeremy M. Mittman
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IT IS SO ORDERED.

26 Dated: December 30, 2009
27 /s/ John A. Mendez
28 UNITED STATES DISTRICT COURT JUDGE