

1 Mark E. Ellis - 127159
 Ronald R. Poirier - 175511
 2 Teresa L. Zuber - 164213
 ELLIS, LAVOIE, POIRIER,
 3 STEINHEIMER & McGEE LLP
 555 University Avenue, Suite 200 East
 4 Sacramento, CA 95825
 Tel: (916) 283-8820
 5 Fax: (916) 283-8821
mellis@ecplslaw.com
 6 rpoirier@ecplslaw.com
tzuber@ecplslaw.com

7 Attorneys for Plaintiff JENNIFER ZAMORA

8
 9 UNITED STATES DISTRICT COURT
 10 EASTERN DISTRICT OF CALIFORNIA
 11

12 JENNIFER ZAMORA,

13 Plaintiff,

14 v.

15 JANET NAPOLITANO, SECRETARY OF THE
 DEPARTMENT OF HOMELAND SECURITY;
 16 GALE ROSSIDES, ASSISTANT
 SECRETARY/ACTING ADMINISTRATOR OF
 17 THE TRANSPORTATION SECURITY
 ADMINISTRATION; LOREN ISHII; and DOES
 18 1-20,

19 Defendants.

Case No.: 2:09-CV-1292-JAM-EFB

**STIPULATION AND ORDER TO EXTEND
 DISCOVERY CUT-OFF DATE AND
 CONTINUE TRIAL DATE**

TRIAL DATE: August 8, 2011

20
 21 STIPULATION AND ORDER

22 Plaintiff Jennifer Zamora and Defendant, Janet Napolitano, Secretary of The Department of
 23 Homeland Security hereby stipulate and agree that good cause exists for an extending discovery cut-off
 24 and continuing the trial date.

25 On Wednesday, February 23, 2011, counsel for both parties appeared before the Hon.
 26 Magistrate Judge Edmund F. Brennan regarding Plaintiff's motion to compel further discovery. On
 27 February 24, 2011, Judge Brennan issued an order granting in part and denying in part Plaintiff's
 28 motion. See Docket No. 135 re: Order. In addition to addressing Plaintiff's written discovery requests,

1 Judge Brennan granted Plaintiff's request to take 3 new additional depositions and re-open another
2 deposition. The total number of depositions remaining to be taken and/or completed is now 8. The
3 parties, along with Judge Brennan, agreed an additional 60 days may be needed to complete additional
4 discovery ordered by Judge Brennan. Judge Brennan opined that most likely the trial date would have
5 to be continued to accommodate the court and directed Plaintiff's counsel to contact Mr. Vine, clerk
6 for Judge Mendez who is assigned to preside over this case. Mr. Vine provided the following new
7 dates which are agreeable to counsel:

8	Discovery cut-off	5/18/2011
9	Dispositive motion filing:	6/22/11
10	Dispositive motion hearing:	7/20/11 @ 9:30 a.m.
11	Joint pretrial statement filed:	9/2/11
12	Final pretrial conference:	9/9/11 @ 10 a.m.
13	Jury trial:	10/17/11 @ 9:00 a.m.

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15 Respectfully submitted by:

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17 ELLIS, LAVOIE, POIRIER,
18 STEINHEIMER, & MCGEE LLP

19 Dated: February 28, 2011

20 By /s/ Ronald R. Poirier
21 Ronald R. Poirier
22 Attorneys for Plaintiff
23 JENNIFER ZAMORA

24 Benjamin B. Wagner
25 United States Attorney

26 Dated: February 28, 2011

27 By /s/ Jason Ehrlinspiel
28 Jason Ehrlinspiel
Assistant United States Attorney, Attorney for
DEFENDANT JANET NAPOLITANO,
SECRETARY OF THE DEPARTMENT OF
HOMELAND SECURITY

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ORDER

Good cause has been shown to continue the discovery cut-off date in this case. Accordingly, the Court modifies its order of January 6, 2011 as follows:

The trial date of August 8, 2011 is vacated.

Discovery cut-off date is May 18, 2011. Last day to file Dispositive motions, June 22, 2011. Hearing on dispositive motions, July 20, 2011 at 9:30 a.m. Joint pretrial statement due September 2, 2011. Final pretrial conference on September 9, 2011 at 10:00 a.m. Jury trial, October 17, 2011 at 9:00 a.m.

SO ORDERED.

DATED: 2/28/2011

/s/ John A. Mendez
JOHN A. MENDEZ
UNITED STATES DISTRICT JUDGE