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 17 **UNITED STATES DISTRICT COURT**
EASTERN DISTRICT OF CALIFORNIA

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JAMES T. CARDEN, JR.,
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MICHAEL B. SCHAEFER,
ARTHUR J. SCHUBERT,
THURLOW E. WILLIAMS,
MICHELLE W. WOODS,
RAYMOND E. YOUNG,
WILLIAM H. ZIEGLER,

Plaintiffs,

vs.

CHENEGA SECURITY &
PROTECTION SERVICES, LLC,

Defendant

CASE No. 2:09-cv-01799-WBS-CMK

**STIPULATION
TO CONTINUE TRIAL, PRE-
TRIAL CONFERENCE, and
DISPOSITIVE MOTION CUT-OFF
DATES ; ORDER THEREON**

Complaint Filed: June 29, 2009
Trial Date: April 5, 2011

Pursuant to Federal Rule of Civil Procedure 16(b)(4), and for good cause shown, the parties to this action, through their respective counsel of record, hereby stipulate and jointly request that the Court vacate the present TRIAL DATE set forth in this Court’s Status (Pretrial Scheduling) Order) dated October 29, 2009 and the motion and hearing dates set forth in Paragraphs V and VI, and in the Stipulation and Joint Application to Extend Discovery Cut-Off and Order Thereon filed August 20, 2010 (the “Orders”), and that the Court further continue such dates as set forth below, including the date for filing of motions and the date for the final pre-trial conference. **The requested continuances will change the Trial Date, and the Pre-Trial Conference Date, and cut-off date for filing dispositive motions.**

THE PARTIES HEREBY STIPULATE AS FOLLOWS:

1 As set forth in the Declaration of Andrea Miller, co-counsel for Plaintiffs has
2 a medical condition which prevents her from effectively preparing for trial and
3 from representing Plaintiffs at trial and at the schedule pre-trial conference.

4 Plaintiffs have request continuance of the trial date, the pretrial conference
5 date, and the cutoff date for dispositive motions. Defendant does not oppose the
6 request for a continuance, and the parties stipulate to new trial and related dates, as
7 follows:

8 **DISCOVERY**

9 (1) The date for completion of all discovery shall be extended from January
10 14, 2011 to March 16, 2011. All motions to compel discovery shall be noticed and
11 heard at such times so that the motions may be heard (and any resulting orders
12 obeyed) not later than May 16, 2011.

13 **MOTION HEARING SCHEDULE**

14 (2) The deadline for filing motions, except motions for continuance,
15 temporary restraining orders, or other emergency applications, shall be extended
16 from January 14, 2011 to May 31, 2011.

17 **FINAL PRE-TRIAL CONFERENCE**

18 (3) The Final Pre-Trial Conference hearing date of March 7, 2011 shall be
19 continued to August 22, 2011 at 2:00 p.m. in Department 5.

20 **TRIAL**

21 (4) The date for Trial shall be continued from April 5, 2011, to October 18,
22 2011.

1 **IT IS SO STIPULATED.**

2 Date: January 24, 2011 MICHAEL COGAN, ATTORNEY AT LAW

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By: *s/Michael Cogan* _____
Michael Cogan
Attorneys for Plaintiffs
James T. Carden, Jr., Robert L. Fox, Leon W.
Hedrick, Robert E. Klee, George M. Lembo,
Loren E. Loveland, Terry D. Myers, Charles R.
Samuelson, Michael B. Schaeffer, Arthur J.
Schubert, Thurlow E. Williams, Michelle S.
Woods, Raymond L. Young, William H. Ziegler

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11 Date: January 24. 2011 NAGELEY, MEREDITH AND MILLER

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By: *s/Michael Cogan, as authorized by Attorney
Janet M. Meredith to sign on behalf of
Nageley, Meredith and Miller* _____
Andrea Miller
Janet M. Meredith
Attorneys for Plaintiffs
James T. Carden, Jr., Robert L. Fox, Leon W.
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Samuelson, Michael B. Schaeffer, Arthur J.
Schubert, Thurlow E. Williams, Michelle S.
Woods, Raymond L. Young, William H. Ziegler

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Date: January 24, 2011 JACKSON LEWIS LLP

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By: *s/Michael Cogan, as authorized by Jerry J.
Deschler to sign on behalf of Jackson Lewis, LLP* _____
Cary G. Palmer
Dale R. Kuykendall
Jerry J. Deschler, Jr.
Attorneys for Defendant
Chenega Security Protection Services, LLC

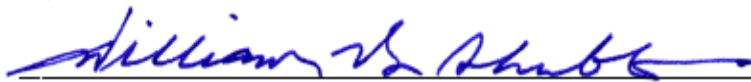
1 **ORDER**

2 Having reviewed the parties' stipulation, and the accompanying Declaration
3 of Andrea Miller, and good cause appearing therefore,

4 **IT IS HEREBY ORDERED** that the Pre-Trial Conference Order of
5 October 30, 2009, as previously modified in February, June, August and
6 September of 2010, shall be further modified as follows:

- 7 (1) The date for completion of all discovery shall be extended from
8 January 14, 2011 to March 16, 2011. All motions to compel discovery
9 shall be noticed and heard at such times so that the motions may be
10 heard (and any resulting orders obeyed) not later than March 31,
11 2011.
- 12 (2) The deadline for filing dispositive motions shall be extended from
13 January 14, 2011 to April 18, 2011.
- 14 (3) The final pre-trial conference date of March 7, 2011 shall be
15 continued to August 22, 2011 at 2:00 p.m. in Department 5.
- 16 (4) The trial date of April 5, 2011 shall be continued to October 18, 2011
17 at 9:00 a.m. in Department 5.

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19 Dated: January 25, 2011

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21 WILLIAM B. SHUBB
22 UNITED STATES DISTRICT JUDGE
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