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8 **Attorneys for Defendant**
9 **UNION PACIFIC RAILROAD COMPANY**

10
11 **IN THE UNITED STATES DISTRICT COURT**
12 **IN AND FOR THE EASTERN DISTRICT OF CALIFORNIA**

13 **JEREMY GILMORE AND DANA**
14 **GILMORE,**

15 **Plaintiffs**

16 **v.**

17 **UNION PACIFIC RAILROAD COMPANY,**
18 **DENNIS MAGURES, JOHN PARKER,**
19 **CAROLYN M. WILL, ANDREW RIBBING**
20 **and LEO MARIN and DOES 1 to 10,**
21 **inclusive,**

22 **Defendants.**

23 **Case No. 2:09-02180-JAM-DAD**

24 **STIPULATION OF THE PARTIES**
25 **TO EXTEND TRIAL DATE AND**
26 **OTHER DEADLINES AND ORDER**

27 **(AS MODIFIED BY THE COURT)**

28 **STIPULATION TO EXTEND TRIAL DATE AND OTHER DEADLINES**

In that the parties need additional time to complete expert discovery and some other limited discovery in this case, and to file dispositive motions, the parties, by and through their attorneys of record, hereby stipulate to extend the date for the trial in this matter and to modify the scheduling order accordingly.

The parties will complete discovery by March 1, 2011; and therefore, request the following pre-trial and trial deadlines: May 2, 2011 (file dispositive motions), June 1, 2011 at 9:30 a.m. (hear dispositive motions),

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2 **June 28, 2011 (file joint pretrial statement), July 6, 2011 at 3:00 p.m.**
3 **(final pretrial conference), and August 15, 2011 at 9:00 a.m. (trial).**

4 **Dated: January 3, 2011 RANDOLPH CREGGER & CHALFANT LLP**

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6 **By /s/ Stephanie L. Quinn**
7 **STEPHANIE L. QUINN**
8 **Attorneys for Defendant UNION PACIFIC**
9 **RAILROAD COMPANY**

10 **Dated: January 3, 2011 LARRY LOCKSHIN, ESQ.**
11 **A Law Corporation**

12 **By /s/ Larry Lockshin**
13 **LARRY LOCKSHIN, ESQ.**
14 **Attorneys for Plaintiffs JEREMY and DANA**
15 **GILMORE**

16 **IT IS SO ORDERED:**

17 **Dated: January 3, 2011 /s/ John A. Mendez**
18 **HON. JOHN A. MENDEZ**
19 **U.S. DISTRICT JUDGE**