1 2 3 4 5 6 7	Christopher F. Wohl, SBN: 170280 Nicole Legrottaglie, SBN: 271416 PALMER KAZANJIAN WOHL HODSON I 520 Capitol Mall, Suite 600 Sacramento, CA 95814 Telephone: (916) 442-3552 Facsimile: (916) 442-3606 Attorneys for Defendants CHICAGO TITLE COMPANY, KAREN BRENNEN, JULIE STEVENSON a GREG FARR		
8	UNITED STATES DISTRICT COURT		
9	FOR THE EASTERN DISTRICT OF CALIFORNIA		
10	ELENA CRAWFORD,	Case No. 2:09-cv-03153-JAM-KJN	
11	Plaintiff,		
12	v.	STIPULATION AND ORDER TO MODIFY THE STATUS (PRETRIAL SCHEDULING)	
13	CHICAGO TITLE COMPANY, KAREN	ORDER	
14	BRENNEN, JULIE STEVENSON, GREG FARR, and DOES 1-20,	Judge: John A. Mendez	
15	Defendants.		
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17			
18	WHEREAS, on November 12, 2010, the Court granted Defendants' unopposed motion to		
19	continue the trial date and modify the Status (Pretrial Scheduling) Order ("Scheduling Order")		
20	extending several deadlines including the deadline for completion of discovery to March 15,		
21	2011.		
22	WHEREAS, on February 28, 2011, the parties further agreed to modify the Scheduling		
23	Order extending discovery extending the discovery deadline to April 15, 2011. The Court		
24	approved the stipulation on February 28, 2011.		
25	WHEREAS, on April 5, 2011, the parties further agreed to modify the Scheduling Order		
26	extending discovery extending the discovery deadline to June 15, 2011. The Court approved the		
27	stipulation on April 5, 2011.		
28			
PALMER KAZANJIAN WOHL HODSON LLP 520 Capitol Mall, Suite 600 Sacramento, CA 95814 916.442.3552	STIPULATION AND ORDER TO MODIFY THE STATUS (PRETRIAL SCHEDULING) ORDER		

1	WHEREAS, Plaintiff proposes to file a First Amended Complaint to dismiss certain		
2	claims and parties and to add claims. Defendants will not oppose the proposed filing of the First		
3	Amended Complaint.		
4	WHEREAS, the parties have completed several depositions in May and June 2011 but		
5	need additional time to complete discovery necessitated in part by the new claims in Plaintiff's		
6	proposed First Amended Complaint. The parties therefore wish to extend the last day to complete		
7	discovery from June 10, 2011 to August 12, 2011. The parties feel that extending the time to		
8	complete discovery may assist in resolving issues to better position the case for mediation.		
9	The parties hereby agree to modify the Scheduling Order in the following ways and ask		
10	that the Court approve this modification:		
11			
12	FILE AND SERVE FIRST AMENDED COMPLAINT	JUNE 22, 2011	
13	COMPLETION OF ALL DISCOVERY	AUGUST 12, 2011	
14	DISPOSITIVE MOTION FILING DEADLINE	SEPTEMBER 9, 2011	
15	DISPOSITIVE MOTION HEARING DEADLINE	OCTOBER 19, 2011 (at	
16		9:30 a.m.)	
17	JOINT PRETRIAL CONFERENCE STATEMENT	DECEMBER 2, 2011	
18	FINAL PRETRIAL CONFERENCE	DECEMBER 9, 2011 (at	
19		10:00 a.m.)	
20	TRIAL	JANUARY 23, 2012 (at	
21		9:00 a.m.)	
22	IT IS SO STIPULATED.		
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PALMER KAZANJIAN WOHL HODSON LLP 520 CAPITOL MALL, SUTE 600 SACRAMENTO, CA 95814 916.442.3552	STIPULATION AND ORDER TO MODIFY THE STATUS (PRETRIAL 2. SCHEDULING) ORDER		

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1		PALMER KAZANJIAN WOHL HODSON, LLP
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3	Dated: June 16, 2011	By: /s/ Christopher F. Wohl
4		By: <u>/s/ Christopher F. Wohl</u> Christopher F. Wohl Attorneys for Defendants
5	D () I ()011	
6	Dated: June 16, 2011	THE ROSA LAW GROUP
7		By: /s/ Andrea Rosa
8		Andrea Rosa, Esq. Attorney for Plaintiff
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PALMER KAZANJIAN WOHL HODSON LLP 520 CAPITOL MALL, SUITE 600 SACRAMENTO, CA 95814	STIPULATION AND ORDER TO MODIFY THE STATUS (PRETRIAL SCHEDULING) ORDER	3.

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1	<u>ORDER</u>
2	Upon the agreement of the parties hereto, and Good Cause appearing
3	IT IS SO ORDERED.
4	
5	DATED: June 16, 2011
6	<u>/s/ John A. Mendez</u> John A. Mendez
7	United States District Court Judge
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28 PALMER KAZANJIAN WOHL HODSON LLP	STIPULATION AND ORDER TO MODIFY THE STATUS (PRETRIAL 4.
WOHL HODSON LLP 520 CAPITOL MALL, SUITE 600 SACRAMENTO, CA 95814	STIPULATION AND ORDER TO MODIFY THE STATUS (PRETRIAL 4.