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17 Attorneys for Plaintiffs
 18 YVETTE DANIELS, MARIA AGUILAR
 19 and KAREN CURRIE

20 UNITED STATES DISTRICT COURT
 21 EASTERN DISTRICT OF CALIFORNIA

22	YVETTE DANIELS, MARIA AGUILAR)	NO. 2:10-CV-00003-MCE-DAD
23	AND KAREN CURRIE, individually and on)	
24	behalf of all persons similarly situated,)	STIPULATION AND ORDER TO ENLARGE
25	Plaintiffs,)	PRETRIAL SCHEDULING ORDER
26	v.)	
27	CALIFORNIA DEPARTMENT OF)	HON. MORRISON C. ENGLAND
28	CORRECTIONS AND REHABILITATION,)	
	Defendant.)	

29 Per the Pretrial Scheduling Order issued in this case on October 19, 2010, all
 30 discovery for class certification is to be completed by March 3, 2011. On October 28, 2010,
 31 Plaintiffs timely objected to the Pretrial Scheduling Order because Attorney Pamela Y. Price,
 32 lead counsel for Plaintiffs, is not available at the time of the hearing is scheduled, and
 33 respectfully requested that the Court reset the Class Certification hearing. The Court has yet to

1 rule on Plaintiffs' Objection to the Pretrial Scheduling Order.

2 Good cause exists for this Stipulation because both parties are desirous of completing
3 the discovery in the case, which is critical to the fair administration of justice and essential to
4 the fact-finding process. Plaintiffs have been limited in their ability to conduct discovery
5 because their counsel, Price And Associates, purchased a building and moved the office to its
6 new location taking up much of the Firm's time and resources, in December and January. The
7 office was closed to the public for two weeks at the end of December 2010. Additionally,
8 attorney George S. Khoury, a key member of the litigation team, unexpectedly and abruptly left
9 Price And Associates in January 2011.

10 Since then the parties have attempted to conduct the necessary discovery needed to
11 prepare for Plaintiffs' Class Certification. Having met and conferred, the deposition of
12 Plaintiff Maria Aguilar was scheduled for February 9, 2011, the deposition of Plaintiff Yvette
13 Daniels for February 10, 2011, and the deposition of Plaintiff Karen Currie for February 17,
14 2011.

15 On February 8, 2011, Ms. Talley informed me that she would not be able to proceed
16 with Ms. Aguilar's deposition scheduled for February 9th, because she was ill with the flu. Ms.
17 Aguilar's deposition cannot be rescheduled until after March 4, 2011, because Ms. Aguilar will
18 be out of the country from February 15, 2011 through March 4, 2011.

19 Plaintiffs intend to notice and take Defendant California Department of Corrections and
20 Rehabilitation's deposition under Federal Rule 30(b)(6). Due to defense counsel's upcoming
21 trial schedule, it will be difficult to schedule this key deposition before the current discovery
22 cut-off date. Having met and conferred, counsel for both parties are agreeable to moving all
23 dates in the Pretrial Scheduling Order, and propose to modify the current Pretrial Scheduling
24 Order as follows:

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EVENT	CURRENT DATE	PROPOSED DATE
Class Certification Discovery Cut-Off:	March 3, 2011	May 18, 2011
Class Certification Hearing	May 5, 2011	July 20, 2011

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Dated: February 9, 2011

PRICE AND ASSOCIATES

/s/ Jeshawna R. Harrell
JESHAWNA R. HARRELL, Attorney for Plaintiffs

Dated: February 9, 2011


CALIFORNIA DEPARTMENT OF JUSTICE
DEPUTY ATTORNEY GENERAL

/s/ Jill H. Talley
JILL H. TALLEY, Attorney for Defendant

ORDER

Pursuant to the foregoing stipulation of the parties and good cause appearing therefore,
IT IS HEREBY ORDERED that Class Certification Discovery Cut-Off shall be moved to May 18,
2011, and the Class Certification Hearing shall be continued to July 28, 2011 at 2:00 p.m. (the July 20,
2011 date proposed by the parties is unavailable).

Dated: February 18, 2011


MORRISON C. ENGLAND, JR.
UNITED STATES DISTRICT JUDGE