

PAUL L. REIN, Esq., (SBN 43053)
 CELIA McGUINNESS, Esq. (SBN 159420)
 CATHERINE M. CABALO, Esq. (SBN 248198)
 LAW OFFICES OF PAUL L. REIN
 200 Lakeside Drive, Suite A
 Oakland, CA 94612
 Telephone: 510/832-5001
 Facsimile: 510/832-4787

Attorneys for Plaintiff
 GUY JONES

SID M. ROSENBERG, Esq. (SBN 129158)
 LAW OFFICES OF ROSENBERG & LINK
 725 30th St., Suite 107
 Sacramento, CA 95816
 Telephone: 916/447-8101
 Facsimile: 916/447-4750

Attorney for Defendants
 BRYAN KWONG; SPENCER KWONG; IRENE
 KWONG; EL PUERTO RESTAURANT, INC.;
 ISIDRO MARTIN RODRIGUEZ

UNITED STATES DISTRICT COURT
 EASTERN DISTRICT OF CALIFORNIA

GUY JONES,
 Plaintiff,

CASE NO. 2:10-CV-01200 JAM/KJN
Civil Rights

v.

BRYAN KWONG; SPENCER
 KWONG; IRENE KWONG; EL
 PUERTO RESTAURANT, INC.;
 ISIDRO MARTIN RODRIGUEZ; and
 DOES 1-10, Inclusive,
 Defendants.

**STIPULATION AND ORDER TO
 CONTINUE TRIAL AND PRE-
 TRIAL DEADLINES**

Plaintiff GUY JONES ("Plaintiff") and Defendants BRYAN
 KWONG; SPENCER KWONG; IRENE KWONG; EL PUERTO
 RESTAURANT, INC.; ISIDRO MARTIN RODRIGUEZ (together sometimes

1 “Defendants”), by and through their respective counsel, jointly stipulate and
2 request through their attorneys of record as follows:

3 On January 14, 2011, Plaintiff forwarded Defendants a draft Consent
4 Decree & Proposed Order addressing all of Plaintiff’s injunctive relief claims in
5 this case. On February 9, 2011, the parties met and conferred and made progress
6 toward settling Plaintiff’s injunctive relief claims. The parties have been working
7 cooperatively to settle injunctive relief aspects of this case and believe that there
8 is a good likelihood that the parties will be able to settle all issues of injunctive
9 relief, damages, and attorneys’ fees, litigation expenses, and costs if given more
10 time – specifically time to prepare for and participate in a settlement conference
11 to be set by the Court pursuant to the stipulated order to set a settlement
12 conference in this case, which will be filed contemporaneously with this
13 stipulated order to continue deadlines.

14 The current deadlines in this case are as follows:

15 Expert disclosure:	March 11, 2011
16 Supplemental expert disclosure:	March 18, 2011
17 Joint Mid-Litigation Statement:	May 6, 2011
18 Discovery cut-off:	May 20, 2011
19 Dispositive Motion filing deadline:	June 22, 2011
20 Dispositive Motion hearing deadline:	July 20, 2011
21 Joint Pre-trial Statement:	August 19, 2011
22 Final Pre-trial Conference:	August 26, 2011
23 Trial:	October 3, 2011.

24 Based on the above, the parties hereby agree and stipulate to the
25 continuation of the above-noted deadlines in this case to the following:

26 Expert disclosure:	August 1, 2011
27 Supplemental expert disclosure:	August 8, 2011
28 Joint Mid-Litigation Statement:	October 10, 2011

1 Discovery cut-off: November 7, 2011
2 Dispositive Motion filing deadline: December 14, 2011
3 Dispositive Motion hearing deadline: January 11, 2012 at 9:30 a.m.
4 Joint Pre-trial Statement: February 17, 2012
5 Final Pre-trial Conference: February 24, 2012 at 11:00 a.m.
6 Trial: April 2, 2012 at 9:00 a.m.

7 **IT IS SO STIPULATED.**
8

9 Dated: March 3, 2011 LAW OFFICES OF PAUL L. REIN
10

11 /s/ Catherine M. Cabalo
12 By: CATHERINE M. CABALO
13 Attorneys for Plaintiff
14 GUY JONES

15 Dated: March 3, 2011 LAW OFFICES OF ROSENBERG & LINK
16

17 /s/ Sid Rosenberg
18 By: SID M. ROSENBERG
19 Attorney for Defendants
20 BRYAN KWONG; SPENCER KWONG; IRENE
21 KWONG; EL PUERTO RESTAURANT, INC.;
22 ISIDRO MARTIN RODRIGUEZ
23
24
25
26
27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

ORDER (as modified by the Court)

Good cause having been shown, the Court grants the parties' stipulation and request to continue deadline s in this case to the following:

Expert disclosure:	August 1, 2011
Supplemental expert disclosure:	August 8, 2011
Joint Mid-Litigation Statement:	October 10, 2011
Discovery cut-off:	November 7, 2011
Dispositive Motion filing deadline:	December 14, 2011
Dispositive Motion hearing deadline:	January 11, 2012 at 9:30 a.m.
Joint Pre-trial Statement:	February 17, 2012
Final Pre-trial Conference:	February 24, 2012 at 11:00 a.m.
Trial:	April 2, 2012 at 9:00 a.m.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: 3/4/2011

/s/ John A. Mendez
Honorable JOHN A. MENDEZ
United States District Court Judge