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19 BRYAN KWONG; SPENCER KWONG; IRENE
20 KWONG; EL PUERTO RESTAURANT, INC.;
21 ISIDRO MARTIN RODRIGUEZ

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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.

Based on the above, the parties hereby agr

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.

IT IS SO STIPULATED.

Dated: March 3, 2011

LAW OFFICES OF PAUL L. REIN

/s/ Catherine M. Cabalo
By: CATHERINE M. CABALO
Attorneys for Plaintiff
GUY JONES

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

LAW OFFICES OF ROSENBERG & LINK

/s/ Sid Rosenberg
By: SID M. ROSENBERG
Attorney for Defendants
BRYAN KWONG; SPENCER KWONG; IRENE
KWONG; EL PUERTO RESTAURANT, INC.;
ISIDRO MARTIN RODRIGUEZ

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 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