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11 Attorneys for Defendant R. Yassine

12  
 13 THE UNITED STATES DISTRICT COURT  
 14  
 15 FOR THE EASTERN DISTRICT OF CALIFORNIA

16 William Barker,  
 17  
 18 Plaintiff,  
 19  
 20 v.  
 21 R. Yassine,  
 22  
 23 Defendant.

} Case No. 2:11-cv-00246-LKK-AC

} **Stipulation and [Proposed] Order to**  
 } **Continue Discovery Deadline for Limited**  
 } **Purpose of Conducting Defendant**  
 } **Yassine’s Deposition**

} Current Deadline: September 8, 2014

} Hon. Magistrate Judge Allison Claire

1 The following Stipulation is entered into by and between Plaintiff  
2 William Barker (“Plaintiff”) and Defendant R. Yassine (“Defendant”)  
3 (collectively the “Parties”):

4 WHEREAS, the discovery cut-off deadline in this case is September 8,  
5 2014;

6 WHEREAS, the parties have timely completed written discovery in this  
7 case, including the production of confidential documents subject to a protective  
8 order;

9 WHEREAS, the parties need additional time to coordinate Defendant’s  
10 deposition;

11 WHEREAS, the parties believe that a thirty (30) day extension of the  
12 discovery cut-off date will allow them to coordinate and complete Defendant’s  
13 deposition;

14 **THEREFORE**, the Parties jointly stipulate and request that this Court  
15 enter an order as follows:

16 The discovery cut-off date be continued from September 8, 2014 to  
17 October 8, 2014 for the limited purpose of conducting Defendant’s deposition.

18 **IT IS SO STIPULATED.**

19 Dated: September 2, 2014                      DISABLED ADVOCACY GROUP, APLC

20  
21 /s/ Scottlynn J Hubbard IV  
22 Scottlynn J Hubbard IV, Esq.  
23 Attorney for Plaintiff William Barker

24 Dated: September 2, 2014                      BURKE, WILLIAMS & SORENSEN, LLP

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26 /s/ Martin Kosla  
27 Martin Kosla, Esq.  
28 Attorney for Defendant R. Yassine

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[PROPOSED] ORDER ON STIPULATION

Good cause appearing, IT IS HEREBY ORDERED that the discovery cut-off date is continued from September 8, 2014 to October 8, 2014 for the limited purpose of conducting defendant R. Yassine's deposition.

IT IS SO ORDERED.

Dated: September 2, 2014

  
\_\_\_\_\_  
ALLISON CLAIRE  
UNITED STATES MAGISTRATE JUDGE