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5 Attorney for Plaintiff
 6 PEGGY BOYNTON

7 UNITED STATES DISTRICT COURT
 8 EASTERN DISTRICT OF CALIFORNIA
 9

10 PEGGY BOYNTON,

11 Plaintiff,

12 v.

13 UNITED STATES OF AMERICA,

14 Defendant.

15 UNITED STATES OF AMERICA,

16 Counter-Claimant,

17 v.

18 PEGGY BOYNTON,

19 Counter-Defendant.
 20

Case No. 2:11-cv-00623-MCE-EFB

**STIPULATION TO EXTEND DISCOVERY
 CUT-OFF AND EXPERT DISCLOSURE
 DATES AND ORDER THEREON**

21 IT IS HEREBY STIPULATED by and between the parties to the above-captioned action through
 22 their respective attorneys of record as follows:

23 To extend the deadline for expert disclosure to May 31, 2014, and the discovery cutoff date to
 24 June 30, 2014. The parties further stipulate that the dispositive motion cutoff be extended to
 25 September 30, 2014. The final pretrial conference on November 13, 2014 and trial date of January 5,
 26 2015 to remain as calendared. Good cause exists to grant the stipulation because Plaintiff's counsel
 27 very recently substituted into this matter. It appears that no discovery has been conducted, and counsel's

1 attempts to retrieve the case file from Plaintiff's former attorney have been unsuccessful. Based on the
2 foregoing, the parties respectfully request that the court grant the above-referenced extensions of the
3 discovery cut-off and expert disclosure dates.
4

5 SO STIPULATED

6 Dated: December 12, 2013

UNITED STATES ATTORNEY

7 By: /s/ Bobbie J. Montoya
8 Bobbie J. Montoya
9 Attorneys for Defendant
United States of America

10 Dated: December 12, 2013


CABLE GALLAGHER

11 By: /s/ Mark T. Gallagher
12 Mark T. Gallagher
13 Attorney for Plaintiff
14 Peggy Boynton

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16 The parties' stipulated request for an extension of discovery dates is GRANTED, and an
17 amended Pretrial Scheduling Order setting all relevant dates will issue shortly.

18 **IT IS SO ORDERED.**

19 **Dated: December 31, 2013**

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22 MORRISON C. ENGLAND, JR., CHIEF JUDGE
UNITED STATES DISTRICT COURT