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15 Attorneys for Plaintiff Kelly Keehner

16 UNITED STATES DISTRICT COURT - EASTERN DISTRICT OF CALIFORNIA
 17 SACRAMENTO DIVISION

18 KELLY KEEHNER,
 19
 Plaintiff, v.
 20 THE JACKSON LABORATORY, a
 21 Corporation of unknown origin; and DOES
 1 through 100, inclusive,
 22
 Defendants.

Case No. 2:11-cv-01954-WBS-EFB

**STIPULATION AND [PROPOSED]
 ORDER TO CONTINUE DISCOVERY
 AND EXPERT DISCLOSURE DEADLINES
 [E.D. Cal. L. R. 137; 143]**

Courtroom 5
 Judge: Hon. William B. Shubb

24 Plaintiff KELLY KEEHNER ("Plaintiff") and Defendant THE JACKSON
 25 LABORATORY ("Defendant"), by and between their respective attorneys of record, hereby
 26 stipulate as follows:

27 1. On September 20, 2011, the parties filed a Joint Status Report with this Court,
 28 agreeing and requesting that the discovery cut-off occur 90 days before trial.

1 2. On October 28, 2011, this Court issued a Pretrial Scheduling Order, setting the
2 trial date for August 28, 2012.

3 3. The Pretrial Scheduling Order also set the expert disclosure deadline for no later
4 than January 17, 2012, which is 7 months before the scheduled trial date. The Pretrial
5 Scheduling Order further set the completion of discovery for no later than February 29, 2012,
6 which is 6 months before the scheduled trial date.

7 4. The parties have had insufficient opportunity to propound necessary discovery and
8 take depositions in preparation for a Motion for Summary Judgment or Trial.

9 5. The parties have not yet received all of Plaintiff's medical records to provide to
10 experts and have had insufficient opportunity to obtain expert reports before the January 17, 2012
11 deadline.

12 6. A brief 30 day continuance of the deadlines is necessary in order for both parties to
13 obtain the information necessary to prepare a Motion for Summary Judgment or for Trial.

14 7. Pursuant to Local Rules 137 and 143, as well as Section IX of the Pretrial
15 Scheduling Order, the parties agree to a continuance of the expert disclosure and reports cut-off to
16 February 17, 2012 and discovery cut-off to March 29, 2012.

17 SO STIPULATED:

18 Dated: January 6, 2012

SHAW VALENZA LLP

19
20 By: s/D. Gregory Valenza

D. Gregory Valenza

Amy K. Lee

Attorneys for Defendant

THE JACKSON LABORATORY

21
22
23 Dated: January 6, 2012

LEO F. DONAHUE, INC.

LAW OFFICES OF KEVIN W. HARRIS

24
25
26 By: s/Leo F. Donahue

Leo F. Donahue

Kevin W Harris

Attorneys for Plaintiff

Kelly Keehner

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ORDER

Pursuant to the parties' Stipulation, and GOOD CAUSE APPEARING therefore:

IT IS HEREBY ORDERED that the parties shall disclose experts and produce reports by no later than February 17, 2012.

IT IS FURTHER ORDERED that all discovery shall be completed by March 29, 2012.

DATED: January 9, 2012



WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE

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