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13 Attorneys for Plaintiff  
14 **SHAUN OWENS**

15 UNITED STATES DISTRICT COURT  
16 EASTERN DISTRICT OF CALIFORNIA

17 **SHAUN OWENS,**  
18 Plaintiff,  
19 v.  
20 **WALGREEN CO.; and DOES 1-100, inclusive,**  
21 Defendant.

Case No. 2:12-CV-00419-WBS-JFM

**STIPULATION FOR ORDER  
SHORTENING TIME FOR HEARING  
OF PLAINTIFF'S UNOPPOSED  
MOTION TO CONTINUE THE DATE  
OF TRIAL AND OF UNOPPOSED  
MOTION OF PLAINTIFF'S  
ATTORNEYS TO BE RELIEVED AS  
COUNSEL; (PROPOSED) ORDER**

Judge: Hon. William B. Shubb

22 Plaintiff, SHAUN OWENS, by and through his attorneys of record, Lawrance A. Bohm  
23 and Erika M. Gaspar and Defendant, WALGREEN CO., by and through their attorney of record  
24 Rex Darrell Berry stipulate to an Order Shortening Time pursuant to Federal Rules of Civil  
25 Procedure Rule 6 and Local Rule 144(e) for a hearing of Plaintiff's Motion to Continue the Date  
26

1 of Trial and of the Unopposed Motion of Plaintiff's Attorneys to be Relieved as Counsel,  
2 submitted herewith, to be set for **February 11, 2013 at 2:00 p.m.**

3 **I. EXISTENCE OF GOOD CAUSE**

4 1. Good cause exists in Plaintiff is seeking other counsel for representation in  
5 this matter.

6 2. Good cause exists in that Plaintiff will be prejudiced if the motions  
7 submitted herewith are not heard on shortened time. Defendant will not be prejudiced if  
8 the motions are heard on shortened time as it does not oppose the motions and does not  
9 intend to file an opposition.

10 3. Good cause exists in that before the referenced matters can be heard and  
11 ruled on by this Court pursuant to Local Rule 230 and Federal Rules of Civil Procedures  
12 78, two crucial trial-related deadlines will have passed:

- 13 • the current date for disclosure of experts and reports per Rule 26(a)(2)
- 14 is February 15, 2013. (Doc. 33);
- 15 • the current deadline by which responses are due to the currently
- 16 outstanding written discovery, and the deadline for completion of the
- 17 pending previously noted depositions is February 25, 2013 (Doc. 33).
- 18
- 19
- 20

21 4. Good cause exists in that counsel for the parties believe the interests of  
22 justice and efficiency would be served by an Order granting the request to shortening time.

23 Dated: February 5, 2013

24 By: /s/Erika M. Gaspar

LAWRANCE A. BOHM, ESQ.  
ERIKA M. GASPAR, ESQ.  
Attorneys for Plaintiff  
SHUAN OWENS

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Dated: February 1, 2013

By: /s/Rex Darrell Berry  
REX DARRELL BERRY, ESQ.  
BERRY & BLOCK LLP  
Attorneys for Defendant  
WALGREEN, CO.

**ORDER**

GOOD CAUSE APPEARING, the Court sets the matters for hearing as follows:

**Motion:**

**Hearing Date & Time:**


Plaintiff's Unopposed Motion to Continue the Date of  
Trial and to Modify the Status (Pretrial Scheduling) Order  
Unopposed Motion of Plaintiff's Attorneys to be Relieved  
As Counsel.

**February 11, 2013 at 2:00 p.m.**  
**February 11, 2013 at 2:00 p.m.**

**Both motions shall be filed immediately. Counsel for plaintiff, Shaun Owens, is ordered to assure the plaintiff's appearance at the hearing on the motion to withdraw, set for February 11, 2013 at 2:00 p.m.**

IT IS SO ORDERED:

Date: February 5, 2013

  
WILLIAM B. SHUBB  
UNITED STATES DISTRICT JUDGE