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6
 7 IN THE UNITED STATES DISTRICT COURT
 8 EASTERN DISTRICT OF CALIFORNIA
 9

10 MARY MOULTON,
 11 Plaintiff,
 12 v.
 13 UNITED STATES OF AMERICA,
 14 Defendant.

CASE NO. 2:12-CV-02596 TLN-CMK

**STIPULATION AND ORDER TO MODIFY
 DISCOVERY DEADLINES IN PRETRIAL
 SCHEDULING ORDER**

15
 16 Plaintiff Mary Moulton and Defendant United States, by and through their respective counsel,
 17 stipulate and respectfully request the below modification to discovery deadlines in the Court’s Pretrial
 18 Scheduling Order (Dkt 14) for good cause. The parties do not request modification of any other dates.

19 1. The parties respectfully request extending discovery deadlines due to the delay in
 20 scheduling and conducting Plaintiff’s psychological independent medical examination, which was taken
 21 on January 27-28, 2014. [Dkt 16] The parties have been working together to schedule deposition dates,
 22 but have not been able to finalize those dates yet. In addition, Plaintiff’s counsel is scheduled to begin a
 23 2-3 week long trial on March 3, 2014.

24 2. The parties respectfully request extending deadlines for non-expert discovery from
 25 February 21, 2014 to April 18, 2014; for initial expert disclosures from April 22, 2014 to May 2, 2014;
 26 and for supplemental expert disclosures from May 12, 2014 to May 16, 2014. The Court previously
 27 ordered that supplemental expert disclosures be made within twenty (20) days of initial expert
 28 disclosures and the parties request shortening this time period to fourteen (14) days to avoid modifying

1 the July 17, 2014 date set for the dispositive motion hearing.

2 3. The parties do not request modification of any other dates, including the December 8,
3 2014 trial date.

	<u>Current</u>	<u>Proposed</u>
4 Non-expert discovery cutoff:	February 21, 2014	April 18, 2014
5 Initial expert disclosures:	April 22, 2014	May 2, 2014
6 Supplemental expert disclosures:	May 12, 2014	May 16, 2014
7 Last day for motion hearing:	July 17, 2014	July 17, 2014 [same]
8 Joint Pretrial Statement:	September 11, 2014	September 11, 2014 [same]
9 Final Pretrial Conference:	October 9, 2014	October 9, 2014 [same]
10 Trial:	December 8, 2014	December 8, 2014 [same]

14 Dated: February 18, 2014

BENJAMIN B. WAGNER
United States Attorney

/s/ Chi Soo Kim

CHI SOO KIM
Assistant United States Attorney

18 Dated: February 18, 2014

LAW OFFICE OF ROBERT L. DAVIS

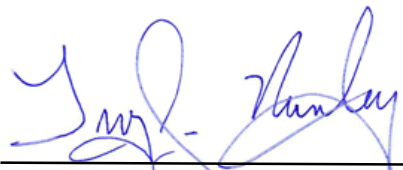
/s/ Robert L. Davis

ROBERT L. DAVIS
Attorney for Plaintiff

22 **ORDER**

24 **IT IS SO ORDERED.**

26 Dated: February 19, 2014



Troy L. Nunley
United States District Judge