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14 **UNITED STATES DISTRICT COURT**
15 **EASTERN DISTRICT OF CALIFORNIA, SACRAMENTO DIVISION**

16 ELIZABETH SAMUELS,
17
18 Plaintiff,
19 vs.
20 OWENS-BROCKWAY GLASS
CONTAINER, INC. and DOES I through V,
21 Defendants.

CASE NO. 2:13-CV-00713-GEB-DAD

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND DEADLINE TO
FILE FRCP 15(a) MOTION TO AMEND
PLEADINGS**

Judge: Honorable Garland E. Burrell

22 The parties, by and through their attorneys of record have met and conferred and agreed to
23 the following stipulation:

24 (1) On July 8, 2013, the Court entered its Pretrial Scheduling Order setting the
25 discovery and trial schedule in this matter. *See* Docket No. 11.

26 (2) Pursuant to this order, the parties' last day to "file a motion in which leave is
27 sought under Federal Rule of Civil Procedure 15(a) to amend their pleadings in response to
28 information obtained during discovery" is December 2, 2013. *Id.* Also pursuant to this order, the

1 close of fact discovery is not until October 14, 2014 and trial is scheduled for May 19, 2015. *Id.*

2 (3) The parties have each served written discovery on each other and are in the process
3 of preparing their respective responses. The parties have yet to conduct any depositions in this
4 case.

5 (4) Given the current status of discovery in this case, the parties have met and
6 conferred and agreed that an extension of the parties' deadline to file a motion to amend the
7 pleadings under FRCP 15(a) would be in the best interest of each party.

8 (5) The parties have not previously requested nor received an extension of this
9 deadline.

10 Therefore, the parties have agreed to and propose a brief extension of the current deadline
11 to file a motion to amend the pleadings under FRCP 15(a) from its current date of December 2,
12 2013 to January 31, 2014.

13 **IT IS SO STIPULATED.**

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15 Dated: October 17, 2013

SANDRA J. COHEN

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By: /s/ Sandra J. Cohen (approved 10/17/13)

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Sandra J. Cohen
Attorneys for Plaintiff
ELIZABETH SAMUELS

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19 Dated: October 17, 2013

SCHIFF HARDIN LLP

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By: /s/ Sarah D. Youngblood

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Sarah D. Youngblood
Attorneys for Defendant
OWENS-BROCKWAY GLASS
CONTAINER INC.

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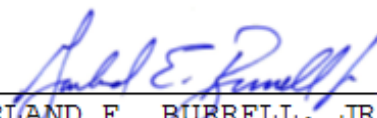
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24 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

25 **Dated: October 22, 2013**

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GARLAND E. BURRELL, JR.
Senior United States District Judge

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