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18 OWENS-BROCKWAY GLASS CONTAINER INC.

19 **UNITED STATES DISTRICT COURT**
20 **EASTERN DISTRICT OF CALIFORNIA, SACRAMENTO DIVISION**

21 ELIZABETH SAMUELS,
22 Plaintiff,
23 vs.
24 OWENS-BROCKWAY GLASS
25 CONTAINER, INC. and DOES I through V,
26 Defendants.

27 CASE NO. 2:13-CV-00713-GEB-DAD
28 **STIPULATION AND [PROPOSED]
ORDER TO EXTEND EXPERT
DISCLOSURE DEADLINES**
Judge: Honorable Garland E. Burrell

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

- 31 (1) On July 8, 2013, the Court entered its Pretrial Scheduling Order setting the
32 discovery and trial schedule in this matter. *See* Docket No. 11.
- 33 (2) Pursuant to this order, the close of fact discovery is not until October 14, 2014 and
34 trial is scheduled for May 19, 2015. *Id.*
- 35 (3) On January 15, 2014, pursuant to the parties' stipulation, the Court entered an order

1 extending the deadline to disclose expert witnesses to July 8, 2014 and extending the deadline to
2 disclose rebuttal expert witnesses to August 5, 2014. See Docket No. 15.

3 (4) The parties have each served written discovery on each other, met and conferred
4 multiple times regarding their respective responses and have informally resolved most of their
5 discovery disputes. Plaintiff's deposition has been taken and Plaintiff plans to take depositions in
6 July.

7 (5) Given the current status of discovery in this case, the fact that the close of
8 discovery is not until October 14, 2014, and that the parties would like to complete as much
9 factual discovery as possible before deposing expert witnesses, the parties have met and conferred
10 and agreed that a further extension of the deadlines to exchange initial and expert disclosures
11 would be in the best interest of each party.

12 Therefore, the parties have agreed to and propose an extension of the initial expert
13 disclosure deadline from July 8, 2014 to August 22, 2014 and an extension of the rebuttal expert
14 disclosure deadline from August 5, 2014 to September 12, 2014.

15 **IT IS SO STIPULATED.**

16 Dated: June 12, 2014

SANDRA J. COHEN

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By: /s/ Sandra J. Cohen

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Sandra J. Cohen
Attorneys for Plaintiff
ELIZABETH SAMUELS

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20 Dated: June 12, 2014

SCHIFF HARDIN LLP

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By: /s/ Sarah D. Youngblood (approved 6/12/12)

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

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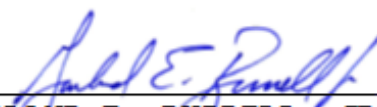
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25 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

26 **Dated: June 13, 2014**

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GARLAND E. BURRELL, JR.

Senior United States District Judge ^{AD}