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8 **Attorneys for Defendant**
9 **BNSF Railway Company**

10 UNITED STATES DISTRICT COURT
11 EASTERN DISTRICT OF CALIFORNIA

12 GRACIELA RAMIREZ, Individually, as	}	CASE NO.: 2:13-CV-00968-GEB-DAD
13 Successor in Interest of Decedent ALMA		
14 VIDRIO, and as Personal Representative of	}	STIPULATION AND [PROPOSED]
15 the ESTATE OF ALMA VIDRIO,		
16 Plaintiffs,	}	ORDER TO AMEND SCHEDULING
17 vs.		
18 BNSF RAILWAY COMPANY, and AGUSTIN	}	Trial Date: March 17, 2015
19 VIDRIO,		
20 Defendants.	}	

21 **Whereas**, the Court previously amended the Pre-Trial Scheduling Order to
22 extend the expert disclosure dates on stipulation of the parties;

23 **Whereas**, after the amendment, a homicide occurred in BNSF's Klamath Falls
24 Yard involving two BNSF employees, which homicide required BNSF to cancel the
25 scheduled site inspections of its retained expert witnesses,

26 Pursuant to BNSF's request, the parties stipulate as follows:

27 1. With the consent of the Court, the Pre-Scheduling Order will be amended
28 such that each party shall comply with Federal Rule of Civil Procedure 26(a)(2)(B) and

1 (C)'s initial expert disclosure requirements on or before June 6, 2014, and any
2 contradictory and/or rebuttal expert disclosure authorized under Rule 26(a)(2)(D)(ii)
3 on or before July 5, 2014.

4 IT IS SO STIPULATED.

5
6 Dated: May 1, 2014

MARY ALEXANDER & ASSOCIATES

7 /s/ MARY ALEXANDER

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9 MARY ALEXANDER
Attorneys for Plaintiff

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12 Dated: May 1, 2014

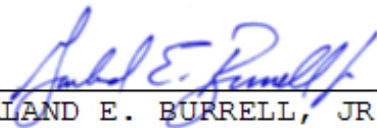
FLESHER McKAGUE LLP

13 /s/ JASON W. SCHAFF

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15 JASON W. SCHAFF
Attorneys for Defendant
16 BNSF RAILWAY COMPANY

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19 **IT IS SO ORDERED:**

20 Dated: May 15, 2014

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24 GARIAND E. BURRELL, JR.
Senior United States District Judge