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Attorneys for Defendant
 DOLLAR TREE STORES, INC.

UNITED STATES DISTRICT COURT
 EASTERN DISTRICT OF CALIFORNIA
 SACRAMENTO DIVISION

RICHARD STAFFORD, Individually,
 Plaintiff,

v.

DOLLAR TREE STORES, INC. and
 DOES 1 through 50, Inclusive,
 Defendants.

Case No. 2:13-cv-01187-KJM-CKD

**STIPULATION AND ORDER
 EXTENDING DISCOVERY CUTOFF FOR
 LIMITED PURPOSES**

Judge: Hon. Kimberly J. Mueller

Complaint Filed:	November 18, 2012
FAC Filed:	January 7, 2013
Case Removed:	February 4, 2013
SAC Filed:	February 12, 2013
TAC Filed:	April 21, 2015
Trial Date:	March 25, 2016

1
2 **STIPULATION**

3 Plaintiff RICHARD STAFFORD (“Stafford”) and Defendant DOLLAR TREE STORES,
4 INC. (“Defendant”) have been diligently working to complete all discovery by the August 13, 2015
5 deadline. However, due to unforeseen issues, the parties have been unable to complete the following
6 depositions: (1) the conclusion of Defendant’s 30(b)(6) witness, (2) the deposition of non-party
7 witness Kenneth O’Neal, and (3) the deposition of non-party witness Christopher Bryant.

8 Defendant produced witnesses for all topics listed in Plaintiff’s 30(b)(6) notice, including
9 witness Christine Yu. Plaintiff was unable to complete Ms. Yu’s deposition in a single day, and
10 while the parties were scheduling a final day of deposition, Ms. Yu moved to the Philippines, and is
11 therefore unavailable. Defendant is diligently working on finding a replacement witness, but due to
12 scheduling concerns the deposition may not go forward prior to the discovery cutoff.

13 Defendant served non-party Kenneth O’Neal with a deposition subpoena on June 30, 2015,
14 commanding Mr. O’Neal to appear for deposition on July 14, 2015. Without any excuse, Mr. O’Neal
15 did not appear for his deposition. Defendant served another subpoena on Mr. O’Neal in August
16 2015, commanding him to appear for deposition on August 11, 2015. Mr. O’Neal responded
17 indicating that he was not available any time prior to the discovery cutoff, but that he was available
18 on August 25, 2015.

19 Defendant served non-party Christopher Bryant with a deposition subpoena on May 5, 2015.
20 Without excuse, Mr. Bryant did not appear for his deposition on May 21, 2015. Defendant has been
21 diligently attempting to serve Mr. Bryant with a second deposition subpoena, but Mr. Bryant is
22 evading service.

23 Therefore, the parties, by and through their respective counsel of record, hereby stipulate and
24 agree that that the non-expert discovery cutoff should be extended until September 15, 2015, but
25 only with respect to the depositions of the witnesses identified above. The parties also stipulate and
26 agree that Defendant shall produce documents responsive to Requests for Production Nos. 66, 67
27 and 77 no later than September 15, 2015.
28

1
2 Dated: August 5, 2015

Respectfully submitted,

3 **GRAHAMHOLLIS APC**

4 By: /s/ Joseph E. Jaramillo

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Attorneys for Plaintiff

RICHARD STAFFORD

8
9 Dated: August 5, 2015

Respectfully submitted,

10
11 By: /s/ Jeffrey Mann

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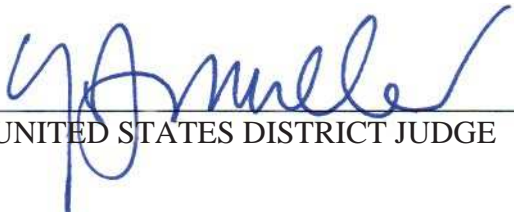
Attorneys for Defendant

DOLLAR TREE STORES, INC.

ORDER

Good cause appearing, the Court hereby **ORDERS** that the non-expert discovery cutoff is hereby extended until September 15, 2015, only with respect to: (1) the conclusion of Defendant's 30(b)(6) deposition, limited to the completion of those topics for which Christine Yu was designated as Defendant's witness, (2) the deposition of non-party witness Kenneth O'Neal, and (3) the deposition of non-party witness Christopher Bryant. Defendant shall also produce documents responsive to Plaintiff's Requests for Production Nos. 66, 67 and 77 no later than September 15, 2015.

DATED: August 12, 2015.


UNITED STATES DISTRICT JUDGE