

1 COMES NOW THE PARTIES by and through their respective attorneys and subject to
2 the approval of this Court, hereby stipulate and respectfully request the following modifications
3 and/or amendments to this Court's Pretrial Scheduling Order dated November 24, 2014 [ECF
4 No. 60]:

- 5 ■ That the expert witness disclosure deadline, currently set for April 15, 2016, be moved to
6 July 15, 2016;
- 7 ■ That the supplemental expert witness disclosure deadline, currently set for April 29,
8 2016, be moved to July 29, 2016;
- 9 ■ That the deadline for all discovery (expert and non-expert) to be completed, currently set
10 for June 15, 2016, be moved to September 16, 2016;
- 11 ■ That the deadline for filing dispositive motions, currently set for July 27, 2016, be moved
12 to October 18, 2016;
- 13 ■ That the deadline for hearing on dispositive motions, currently set for August 24, 2016,
14 be moved to November 15, 2016, at 1:30 p.m.;
- 15 ■ That the deadline for filing the Joint Pretrial Statement be set for January 6, 2017;
- 16 ■ That the Final Pretrial Conference, currently set for September 30, 2016, be moved to
17 January 13, 2017, at 11:00 a.m.; and
- 18 ■ That the Trial, currently set for November 7, 2016, be moved to February 13, 2017, at
19 9:00 a.m.

20 WHEREAS, counsel for all parties have met and discussed the posture of this case, and
21 agree that it would be in the interests of justice and judicial economy and that good causes exists
22 for a modification of the scheduling order;

23 WHEREAS, the parties, through written discovery and meet and confer efforts, have
24 determined that the relevant documents in this matter are in excess of 2,000 pages, and that due
25 to the number of parties and witnesses there will be a significant number of necessary
26 depositions;

27 WHEREAS, due to the nature of the claims in this matter the parties are likely to require
28 the services of one or more experts, who will need to review significant records in order to

1 prepare their reports as required by FRCP 26;

2 WHEREAS, the parties would like to complete written discovery and depositions related
3 to non-expert witnesses prior to disclosure of experts;

4 WHEREAS, this stipulation and proposed order is based on the need for additional time
5 to conduct the above mentioned discovery, complete written discovery, and file pretrial motions;

6 WHEREAS, this request is not being made for the purpose of delay, or any other
7 improper purpose;

8 WHEREAS, continuing the trial date and pretrial deadlines will not prejudice any party
9 or their counsel; and

10 THEREFORE, IT IS HEREBY STIPULATED and agreed by and between the parties
11 that this Court modifies the pretrial deadlines and trial date as set forth above.

12 **IT IS SO STIPULATED.**

13
14 Dated: January 20, 2016

LONGYEAR, O'DEA & LAVRA, LLP

15
16 By: /s/ Amanda L. McDermott

17 JOHN A. LAVRA
18 AMANDA L. MCDERMOTT

19
20 Dated: January 20, 2016

LEIGH LAW GROUP

21
22 By: /s/ Jay T. Jambeck

23 JAY T. JAMBECK
24 MANDY G. LEIGH

25
26 **IT IS SO ORDERED.**

27
28 Dated: _1/20/2016

/s/ John A. Mendez

JOHN A. MENDEZ
United States District Court Judge