

1 COMES NOW THE PARTIES by and through their respective counsel and subject to the
2 approval of this Court, hereby stipulate and respectfully request that this Court's Pretrial
3 Scheduling Order dated January 20, 2016 [ECF No. 63], be modified to reflect new deadlines as
4 follows, or as to accommodate the Court's docket, in order for the parties to participate in an
5 early settlement conference:

	<u>Current Date</u>	<u>New Date</u>
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	Expert Disclosure:	July 15, 2016 Oct. 17, 2016
	Supplemental Expert Disclosure:	July 29, 2016 Oct. 31, 2016
	Close of All Discovery:	Sept. 16, 2016 Nov. 21, 2016
	Filing of Dispositive Motions:	Oct. 18, 2016 Dec. 21, 2016
	Hearing of Dispositive Motions:	Nov. 15, 2016 Jan. 24, 2017, at 1:30p
	Joint Pretrial Statement:	Jan. 6, 2017 June 2, 2017
	Final Pretrial Conference:	Jan. 13, 2017 June 9, 2017 at 11:00a
	Trial:	Feb. 13, 2017 July 17, 2017

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

20 WHEREAS, the parties have agreed to participate in a judicially supervised settlement
21 conference with Magistrate Judge Carolyn Delaney on September 9, 2016 at 9:30 a.m., and
22 allowing the parties to extend the deadlines as requested will save the parties time and expenses
23 while they pursue potential settlement;

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

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

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

3 **IT IS SO STIPULATED.**

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5 Dated: July 11, 2016

LONGYEAR, O'DEA & LAVRA, LLP

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7 By: /s/ Amanda L. McDermott

8 JOHN A. LAVRA
9 AMANDA L. MCDERMOTT

10 Dated: July 11, 2016

LEIGH LAW GROUP, P.C.

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12 By: /s/ Jay T. Jambeck

13 JAY T. JAMBECK
14 MANDY G. LEIGH

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16 **IT IS SO ORDERED.**

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18 Dated: July 11, 2016

/s/ John A. Mendez

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20 JOHN A. MENDEZ
21 United States District Court Judge