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Attorneys for Plaintiff,
TRACY PALUMBO

UNITED STATES DISTRICT COURT
EASTERN DISTRICT

TRACY A. PALUMBO

Plaintiff,

vs.

W. ATLEE BURPEE & CO.; AND DOES 1-
50, INCLUSIVE,

Defendants.

CASE NO. 2:13-CV-02057-GEB-DAD

**JOINT STIPULATION RE: EXTENSION
OF EXPERT DISCLOSURE
DEADLINES; [PROPOSED ORDER]**

THE PARTIES, THROUGH THEIR RESPECTIVE COUNSEL, STIPULATE TO THE
FOLLOWING:

1. Whereas, the Court's scheduling order in this matter sets the expert disclosure deadline on October 20, 2014;
2. Whereas, the Court's scheduling order in this matter sets the rebuttal expert disclosure deadline on November 24, 2014;
3. Whereas the parties previously stipulated to extend the expert disclosure deadline to December 12, 2014, and rebuttal expert disclosure deadlines to January 16, 2015;
4. Whereas, the deposition of Defendant employee Mike Walker by Plaintiff is currently scheduled for December 2, 2014;
5. Whereas the parties have scheduled a settlement conference with a Magistrate Judge Kendall J. Newman for January 16, 2015;
6. Therefore, the parties agree to further extend the **expert disclosure deadline to January 23, 2015, and rebuttal expert disclosure deadlines to February 20, 2015.**

DATED: November 13, 2014

BRAGG & KULUVA

By: /s/
EDWARD GARCIA
Attorney for Defendant
W. Atlee Burpee Company

DATED: November 13, 2014

BOHM LAW GROUP

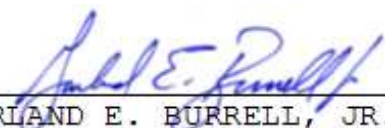
By: /s/ Victoria L. Baiza
(as authorized on 11/19/14)
VICTORIA L. BAIZA
Attorney for Plaintiff
Tracy A. Palumbo

[PROPOSED] ORDER

Pursuant to stipulation, IT IS SO ORDERED that the new expert disclosure deadline is January 23, 2015, and the new rebuttal expert disclosure deadline is February 20, 2015.

Dated: November 19, 2014

JOINT STIPULATION RE: EXTENSION OF


GARLAND E. BURRELL, JR.
Senior United States District Judge