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12 (erroneously sued as "W. Atlee Burpee & Co.")

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23 TRACY PALUMBO

24 UNITED STATES DISTRICT COURT

25 EASTERN DISTRICT

26 TRACY A. PALUMBO

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

28 Plaintiff,

vs.

29 W. ATLEE BURPEE & CO.; AND DOES 1-  
30 50, INCLUSIVE,

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

34 Defendants.

35  
36 THE PARTIES, THROUGH THEIR RESPECTIVE COUNSEL, STIPULATE TO THE  
37 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