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5 Attorneys for Defendant
 BEST WESTERN MED PARK INN & SUITES, LP

8 UNITED STATES DISTRICT COURT
 9 EASTERN DISTRICT OF CALIFORNIA

10 DONNA GARDNER,

11 Plaintiff,

12 v.

13 BEST WESTERN MED PARK INN & SUITES,
 14 LP dba HOTEL MED PARK

15 Defendant.

16 _____
 17 BEST WESTERN MED PARK INN & SUITES,
 18 LP dba HOTEL MED PARK

19 Third-Party Plaintiff,

20 v.

21 STEPHEN CAMERON, AN INDIVIDUAL,
 DBA CAMERON CONSTRUCTION, AND
 22 ZOES 1-25, inclusive,

23 Third-Party Defendant

Case No. 2:13-CV-02148-JAM-KJN

(AS MODIFIED BY THE COURT)
STIPULATION AND ORDER
VACATING TRIAL DATE AND
DISCOVERY DEADLINES AND
SETTING DATE FOR FILING
UPDATED JOINT STATUS REPORT

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WHEREAS, this matter is presently set for trial on **November 9, 2015**, with a discovery cutoff date for Plaintiff and Defendant of **July 1, 2015**.

WHEREAS, STEPHEN CAMERON was recently added as a Third-Party Defendant in the above-captioned matter, and must respond to Defendant/Third-Party Plaintiff BEST WESTERN MED PART INN & SUITES's Third Party Complaint by **July 2, 2015**.

WHEREAS, in light of the recent addition of STEPHEN CAMERON, and the fact his deadline for an initial responsive pleading is near the discovery cut-off date and within months of trial, the Parties wish to avoid the clear prejudice of the Third Party Defendant if the current deadlines and trial date are kept, to avoid the likely duplication of effort due to the new party, and to have more time for discovery, including written discovery, party depositions, expert depositions, and subpoenas, as well as to provide all parties additional time to explore settlement before being forced by deadlines to incur potentially unnecessary costs and attorneys' fees.

WHEREAS, the Parties have jointly agreed and stipulated to request, respectfully, that this Court vacate the current trial date and all discovery deadlines, and to set this matter for a new Status Conference, where new deadlines can be considered and set.

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

WHEREAS, continuing the above-referenced deadlines will not prejudice any party or their counsel; and

NOW, THEREFORE, IT IS HEREBY STIPULATED and agreed by Plaintiff and Defendant, through their respective attorneys of record, that the Court vacate the current trial date

1 and all discovery deadlines, and to set a date for the filing of an updated joint status report.

2 Date: June 24, 2015

DISABLED ADVOCACY GROUP, APLC

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By: /s/ Scottlynn J. Hubbard
SCOTTLYNN J. HUBBARD, IV
Attorney for Plaintiff
DONNA GARDNER

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7 Date: June 24, 2015

BASHAM LAW GROUP

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By: /s/ Gary R. Basham
GARY R. BASHAM
NATHAN T. JACKSON
Attorneys for Defendant
BEST WESTERN MED PARK INN &
SUITES, LP

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ORDER

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Pursuant to stipulation, and for GOOD CAUSE APPEARING, the Court orders that all remaining dates in the January 13, 2014 scheduling order [10] are vacated, and the parties shall file an updated joint status report on or before July 24, 2015.

Dated: 6/25/2015

/s/ John A. Mendez
HONORABLE JOHN A. MENDEZ
UNITED STATES DISTRICT COURT JUDGE

4817-3189-7637, v. 1