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13 Attorneys for Defendant  
 14 THE SYGMA NETWORK, INC.

15 UNITED STATES DISTRICT COURT  
 16 EASTERN DISTRICT OF CALIFORNIA  
 17 SACRAMENTO DIVISION

19 ERIC HILL

20 Plaintiff,

21 v.

22 THE SYGMA NETWORK, INC. and DOES 1  
 23 through 100, INCLUSIVE,

24 Defendants.

Case No. 2:13-cv-02638-MCE-EFB

**STIPULATION TO CONTINUE  
 DISCOVERY AND HEARING ON  
 DISPOSITIVE MOTIONS DEADLINE AND  
 ORDER GRANTING THE REQUEST TO  
 CONTINUE DISCOVERY AND HEARING  
 ON DISPOSITIVE MOTIONS DEADLINE**

CASE No. 2:13-cv-02638-MCE-EFB

STIPULATION TO CONTINUE DISCOVERY AND HEARING ON DISPOSITIVE MOTIONS DEADLINE

1 Plaintiff ERIC HILL (“Plaintiff” or “Hill”) and Defendant THE SYGMA NETWORK,  
2 INC. (“Defendant” or “Sygma”) by and through their counsel, hereby stipulate as follows:

3 WHEREAS, Plaintiff filed the Complaint on October 24, 2013.

4 WHEREAS, Defendant removed this matter to this Court on December 20, 2013.

5 WHEREAS, per this Court’s Pretrial Scheduling Order of March 18, 2014,  
6 discovery shall be completed by September 19, 2014.

7 WHEREAS, the parties timely exchanged initial disclosures and engaged in written  
8 discovery.

9 WHEREAS, Defendant has previously noticed Plaintiff’s deposition to be held on  
10 July 18 and August 12, 2014, but has been unable to commence Plaintiff’s deposition due to  
11 defense counsel’s unanticipated scheduling conflicts.

12 WHEREAS, the parties have agreed to schedule Plaintiff’s deposition for August  
13 28, 2014.

14 WHEREAS, Defendant intends to serve supplemental disclosures, pursuant to  
15 Federal Rule of Civil Procedure 26(e), based upon its identification of additional information  
16 subject to disclosure which may not be known to Plaintiff.

17 WHEREAS, due to scheduling conflicts and trial calendar, Plaintiff’s counsel is  
18 unable to complete discovery, specifically depositions of key witnesses by discovery cut-off  
19 date of September 19, 2014.

20 WHEREAS, per this Court’s Pretrial Scheduling Order, the final pretrial conference  
21 is scheduled for May 28, 2015.

22 WHEREAS, per this Court’s Pretrial Scheduling Order, trial is set for July 20, 2015.

23 WHEREAS, the parties desire to extend the fact discovery deadline from September  
24 19 to November 14, 2014.

25 WHEREAS, the parties desire to extend the deadline to disclose expert witnesses  
26 from November 20 until January 15, 2014.

27 WHEREAS, the parties desire to extend the deadline to hear dispositive motions  
28

1 from March 19 to April 2, 2015.

2 WHEREAS, the parties' desired extension for discovery and hearing dispositive  
3 motions deadlines will not affect the Court's schedule for the final pretrial conference and  
4 trial.

5 THEREFORE, although Plaintiff desired a slightly greater extension, Plaintiff and  
6 Defendant currently stipulate to extend the fact discovery deadline to November 14, 2014.

7 THEREFORE, Plaintiff and Defendant stipulate to extend the expert witness  
8 disclosure deadline to January 15, 2015, with an equivalent extension of all attendant expert  
9 discovery deadlines arising thereafter.

10 THEREFORE, Plaintiff and Defendant stipulate to extend the deadline to hear  
11 dispositive motions to April 2, 2015.

12  
13 IT IS SO STIPULATED.

14 DATED: August 26, 2014

LAW OFFICE OF JEFFREY D. FULTON

15  
16 By: /s/ Jeffrey D. Fulton  
17 Jeffrey D. Fulton  
18 Natalya Grunwald  
Attorneys for Plaintiff,  
ERIC HILL

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DATED: August 26, 2014


REED SMITH LLP

By: /s/ L. Julius M. Turman  
L. Julius M. Turman  
Philip J. Smith  
Attorneys for Defendant,  
THE SYGMA NETWORK, INC.

**ORDER**

**IT IS SO ORDERED.**

Dated: September 3, 2014

  
\_\_\_\_\_  
MORRISON C. ENGLAND, JR., CHIEF JUDGE  
UNITED STATES DISTRICT COURT