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6 Attorneys for Plaintiff  
 BARBARA M. PRICE

8 UNITED STATES DISTRICT COURT  
 9 EASTERN DISTRICT OF CALIFORNIA

11 BARBARA M. PRICE, ) Case No. 2:14-cv-00283-JAM-EFB  
 12 )  
 Plaintiff, ) **STIPULATION FOR EXTENSION OF**  
 13 ) **DISCOVERY DEADLINES; ORDER**  
 v. )  
 14 )  
 15 JAMES MARTIN, CHRONIC HEALTH )  
 SOLUTIONS, DENT-A-MED dba HC )  
 16 PROCESSING CENTER and DOES 1 )  
 through 20, inclusive, )  
 17 )  
 Defendants. )  
 18 )

19 **STIPULATION**

20  
 21 Plaintiff BARBARA M. PRICE, and Defendant DENT A MED, INC.  
 22 dba HC PROCESSING CENTER, hereby stipulate that the Court's  
 23 Status (Pre-trial Scheduling) Order dated July 21, 2014, a copy  
 24 of which is attached hereto as Exhibit "A", be modified as  
 25 follows:

- 1           1.   Discovery cutoff:                           4/10/15;
- 2           2.   Dispositive motion filing:                 5/20/15;
- 3           3.   Dispositive motion hearing:                6/17/15 @ 9:30 AM;
- 4           4.   Joint pre-trial statement due:             7/24/15;
- 5           5.   Pretrial conference:                        7/31/15 @ 10:00 AM;
- 6           6.   Jury trial:                                   9/28/15 @ 9:00 AM.

7  
8           There is good cause for the proposed modification of the  
9 Status (Pre-trial Scheduling) Order. The parties have engaged  
10 in extensive written discovery but before taking expensive  
11 depositions, which would entail cross-country travel, the  
12 parties want to explore settlement negotiations. Extending the  
13 discovery deadline would permit the parties to do so.  
14

15           There have not been any previous time modifications related  
16 to discovery in this case.

17           For the foregoing reasons, and good cause appearing, the  
18 parties request that the Court modify the Status (Pre-trial  
19 Scheduling) Order as set forth herein.  
20

21           **IT IS SO STIPULATED.**

22 DATED: January 27, 2015

DELTA LAW GROUP

23    /s/ Jim G. Price

24 BY: \_\_\_\_\_

JIM G. PRICE\*  
Attorneys for Plaintiff  
BARBARA M. PRICE

1 DATED: January 27, 2015

SUPPA, TRUCCHI & HENEIN, LLP

2 /s/ *Samy S. Henein*

3 BY: \_\_\_\_\_

4 SAMY S. HENEIN  
5 Attorneys for Defendant  
6 DENT A MED, INC. dba  
7 HC PROCESSING CENTER

8 **ORDER**

9 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

10 DATED: January 29, 2015

11 /s/ JOHN A. MENDEZ

12 \_\_\_\_\_  
13 JOHN A. MENDEZ  
14 United States District Court Judge

15  
16 \*I, Jim G. Price, am the ECF user whose identification and  
17 password are being used to file this Stipulation for Discovery  
18 Deadlines. I hereby attest that Samy S. Henein has concurred in  
19 this filing.

20 /s/ *Jim G. Price*