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 5 KATHY STONE

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 7 UNITED STATES DISTRICT COURT
 8 EASTERN DISTRICT OF CALIFORNIA
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10 KATHY STONE,

Case No.: 2:14-cv-00689-JAM-DAD

11 Plaintiff,

**STIPULATION AND DECLARATION;
 ORDER RE EXTENDING THE
 DISCOVERY DEADLINE**

12 vs.

13 SEVERN TRENT SERVICES, INC.;
 DOES 1 through 100,

14 Defendants.

15 _____
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16 IT IS HEREBY STIPULATED by Plaintiff, KATHY STONE, by and through her
 17 attorney, and Defendant, SEVERN TRENT SERVICES, INC., by and through their
 18 attorneys, that the discovery cut-off date set forth in the Court's September 18, 2014
 19 pretrial scheduling order be continued to February 29, 2016 in order to allow the parties
 20 sufficient time to complete depositions and written follow-up discovery in this matter. This
 21 stipulation is based upon the following facts which the parties submit show good cause to
 22 adjust the pretrial scheduling order:

23 1. That on September 18, 2014 the Court established a non-expert discovery
 24 cut-off date of January 15, 2016.

25 2. Since the initiation of this case the parties have engaged in extensive written
 26 discovery including exchanges of written interrogatories and requests for production of
 27 documents. Defendant has taken the deposition of Plaintiff. Due to scheduling conflicts
 28 and not being able to produce witnesses, the Plaintiff has taken no depositions.

1 3. The Plaintiff is still trying to depose Defendant's Person Most Knowledgeable
2 and the parties anticipate needing to conduct additional discovery in order for the parties to
3 gather all the available facts, evaluate the merits of the case; prepare dispositive motions;
4 and to possibly explore resolution of this case. Plaintiff contends that the testimony of
5 Defendant's Person Most Knowledgeable is critical to this case and may reveal other
6 possible witnesses who will need to be deposed. Follow up written discovery and
7 subpoenas will also likely result from this deposition.

8 4. Based upon the foregoing, the parties submit that good cause exists to
9 continue the discovery cutoff to February 29, 2016 because the above-described discovery
10 is crucial to both parties' preparation of their case and due to scheduling conflicts will not be
11 completed by the current deadline. An amendment to the scheduling order will cause no
12 prejudice to either party since both parties have agreed to the continuance; and because
13 the adjustment of the discovery cutoff will not affect the other dates set by this Court and
14 the trial date will not need to be continued.

15 5. That the parties agree that this stipulation is valid under Local Rule 143.

16 IT IS SO STIPULATED.

17 Dated: January 7, 2016

LAW OFFICES OF LARRY L. BAUMBACH

18 /S/ Larry L. Baumbach

19 By: _____

LARRY L. BAUMBACH

Attorney for Plaintiff

21 Dated: January 8, 2016

LITTLER MENDELSON

22 /s/ Barbara A. Blackburn (authorized on 1/8/16)

23 By: _____

24 BARBARA A. BLACKBURN

Attorney for Defendants

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ORDER

Based upon the stipulation of the parties and good cause appearing, the Court orders that the discovery cutoff date is hereby changed to February 29, 2016.

IT IS SO ORDERED.

Dated: 1/8/2016

/s/ John A. Mendez
UNITED STATES DISTRICT COURT JUDGE