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2	State Bar No. 50086 LAW OFFICES OF LARRY L. BAUMBAC	ЭН
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4	Telephone: 530-891-6222	
5	Attorney for Plaintiff KATHY STONE	
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7	UNITED STA	TES DISTRICT COURT
8	EASTERN DIS	STRICT OF CALIFORNIA
9		
10	KATHY STONE,	Case No.: 2:14-cv-00689-JAM-DAD
11	Plaintiff,	STIPULATION AND DECLARATION; ORDER RE EXTENDING THE
12	VS.	DISCOVERY DEADLINE
13	SEVERN TRENT SERVICES, INC.; DOES 1 through 100,	
14		
15	Defendants,	-
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IT IS HEREBY STIPULATED by Plaintiff, KATHY STONE, by and through her 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 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 and the parties anticipate needing to conduct additional discovery in order for the parties to 2 3 gather all the available facts, evaluate the merits of the case; prepare dispositive motions; and to possibly explore resolution of this case. Plaintiff contends that the testimony of 4 5 Defendant's Person Most Knowledgeable is critical to this case and may reveal other possible witnesses who will need to be deposed. 6 Follow up written discovery and 7 subpoenas will also likely result from this deposition.

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

That the parties agree that this stipulation is valid under Local Rule 143.
 IT IS SO STIPULATED.

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17	Dated: Janurary 7, 2016	LAW OFFICES OF LARRY L. BAUMBACH		
18		/S/ Larry L. Baumbach		
19		By: LARRY L. BAUMBACH		
20		Attorney for Plaintiff		
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22	Dated: January 8, 2016	LITTLER MENDELSON		
23		(a) Parbara A. Plaakburn (authorized on 1/8/16)		
24		/s/ Barbara A. Blackburn (authorized on 1/8/16) By:		
25		BARBARA A. BLACKBURN		
		Attorney for Defendants		
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	STIPULATION AND DECLARATION: ORDER RE EXTENDING THE DISCOVERY DEADLINE			

## DECLARATION OF LARRY L. BAUMBACH

I, Larry L. Baumbach, do hereby declare and say the following:

1. I am the attorney of record for the Plaintiff in the above-entitled action. I have prepared this Declaration as evidence in support of the parties' stipulation and request to this Court to continue the discovery cutoff date to February 29, 2016. The facts stated in the stipulation set forth above re true and correct and based upon my personal knowledge.

I declare under the penalty of perjury under the laws of the United States of America that the facts stated above in the stipulation of the parties are true and correct. This Declaration was executed on January 7, 2016 in Chico, California.

/S/ Larry L. Baumbach

## **DECLARATION OF BARBARA A. BLACKBURN**

I, Barbara A. Blackburn, do hereby declare and say the following:

1. I am the attorney of record for the Defendants in the above-entitled action. I have prepared this Declaration as evidence in support of the parties' stipulation and request to this Court to continue the discovery cutoff date to February 29, 2016. The facts stated in the stipulation set forth above re true and correct and based upon my personal knowledge.

I declare under the penalty of perjury under the laws of the United States of America that the facts stated above in the stipulation of the parties are true and correct. This Declaration was executed on January 8, 2016 in Sacramento, California.

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

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3	ORDER	
4	Based upon the stipulation of the parties and good cause appearing, the Court	
5	orders that the discovery cutoff date is hereby changed to February 29, 2016.	
6	IT IS SO ORDERED.	
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8	Dated: 1/8/2016 /s/ John A. Mendez UNITED STATES DISTRICT COURT JUDGE	
9	UNITED STATES DISTRICT COURT JUDGE	
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	STIPULATION AND DECLARATION; ORDER RE EXTENDING THE DISCOVERY DEADLINE	