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 14 COMPASS BANK

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 16 IN THE UNITED STATES DISTRICT COURT
 17 FOR THE EASTERN DISTRICT OF CALIFORNIA
 18 SACRAMENTO DIVISION

19 GLORIA VALERIO,
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 21 Plaintiff,
 22 v.
 23 COMPASS BANK; and DOES 1-50,
 24 inclusive,
 25 Defendants.

Case 2:14-CV-00741-JAM-KJN

**JOINT STIPULATION AND ORDER
 EXTENDING TIME TO
 COMPLETE PLAINTIFF'S
 DEPOSITION**

Complaint Filed: 01/31/14
 Trial Date: 04/24/17

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I. STIPULATION REGARDING PLAINTIFF’S DEPOSITION

GLORIA VALERIO (“Plaintiff”) and COMPASS BANK (“Defendant”) (collectively, “the Parties”), by and through their undersigned counsel, hereby stipulate and agree as follows:

WHEREAS, the Parties requested by stipulation that the Court Order Plaintiff to complete her deposition by April 1, 2016 (“Stipulation”).

WHEREAS, this Court signed the Stipulation on February 4, 2016, Ordering that Plaintiff complete her deposition by April 1, 2016 (“Order”).

WHEREAS, the Parties made a good faith effort to complete Plaintiff’s deposition by the Ordered deadline (including by completing a substantial portion of the deposition testimony), but have determined that they cannot do so because of: (1) various scheduling conflicts (including with Plaintiff’s school schedule); and (2) the substantial amount of evidentiary materials that need to be covered.

WHEREAS, the Parties wish to avoid a situation where they are not in compliance with the Order.

THE PARTIES THEREFORE STIPULATE AND AGREE, THROUGH THEIR RESPECTIVE COUNSEL, THAT PLAINTIFF SHALL COMPLETE HER DEPOSITION IN ITS ENTIRETY BY APRIL 22, 2016. THE PARTIES FURTHER AGREE THAT THEY WILL MEET AND CONFER IN GOOD FAITH TO IDENTIFY ADDITIONAL TIMES/DATES THAT: (1) ARE ON OR BEFORE APRIL 22, 2016; (2) ARE MUTUALLY AGREEABLE; AND (3) TAKE INTO ACCOUNT PLAINTIFF’S SCHOOL SCHEDULE.

Dated: March 30, 2016

GAVRILOV & BROOKS

By: /s/ Cecilia L. Martin (authorized on 3/30/16)

J. Edward Brooks
Cecilia L. Martin

Attorneys for Plaintiff
GLORIA VALERIO

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Dated: March 30, 2016

JACKSON LEWIS P.C.

By: /s/ Carolyn G. Burnette
Carolyn G. Burnette
Douglas M. Egbert

Attorneys for Defendant
COMPASS BANK

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ORDER

Based upon the foregoing stipulation of the Parties, and good cause appearing therefor,

IT IS SO ORDERED:

- 1. Plaintiff Gloria Valerio shall complete her deposition in this matter by April 22, 2016;
- 2. Any violation of the Parties' Stipulation and/or this Order shall subject the offending party to appropriate sanctions, as determined by the Court.

Dated: 3/31/2016

/s/ John A. Mendez
HON. JOHN A. MENDEZ
U. S. DISTRICT COURT JUDGE