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fees exempt pursuant to
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20 Attorneys for Plaintiff
21 STACY MECKLENBERG

22 IN THE UNITED STATES DISTRICT COURT
23 FOR THE EASTERN DISTRICT OF CALIFORNIA

24 STACY MECKLENBERG,
25 Plaintiff,
26 vs.
27 GEORGETOWN DIVIDE PUBLIC UTILITY
28 DISTRICT and DOES 1 through 10,
Defendants.

Case No.: 2:14-cv-00750-TLN-DAD

**STIPULATION AND ORDER
EXTENDING DISCOVERY DEADLINES**

Pursuant to Federal Rules of Civil Procedure, rules 6(b) and 16(b)(4), and Local Rule 144, Plaintiff Stacy Mecklenberg (“Plaintiff”) and Defendant Georgetown Divide Public Utility District (“Defendant”) (collectively, the “Parties”), by and through their respective counsel of record, hereby submit this stipulation and proposed order extending all applicable discovery deadlines.

1 WHEREAS, Plaintiff filed the above-captioned action on March 24, 2014;

2 WHEREAS, on November 6, 2014, the above-entitled Court issued a Pretrial Scheduling
3 Order requiring discovery in this action to be completed by June 19, 2015.

4 WHEREAS, on January 7, 2017, the Parties submitted a Joint Status Report requesting
5 the Court allow the parties to conduct further discovery.

6 WHEREAS, on January 23, 2017, this Court issued a Supplemental Pretrial Scheduling
7 Order requiring discovery in this action to be completed by December 18, 2017.

8 WHEREAS, after an initial notice of deposition was issued by Plaintiff's counsel on
9 September 22, 2017, the Parties agreed to hold the deposition of Defendant's Person Most
10 Knowledgeable, Stephanie Beck, on November 16, 2017, at 3:30 p.m.

11 WHEREAS, after an initial subpoena for personal appearance was issued by Plaintiff's
12 counsel on September 22, 2017, the Parties agreed to hold the deposition of non-party Teresa
13 Stinson on November 16, 2017, at 5:30 p.m.

14 WHEREAS, after an initial notice of deposition was issued by Defendant's counsel on
15 September 26, 2017, the Parties agreed to hold the deposition of Plaintiff on November 17, 2017,
16 at 2:00 p.m.

17 WHEREAS, after an initial subpoena for personal appearance was issued by Defendant's
18 counsel on September 26, 2017, the Parties agreed to hold the deposition of non-party Cindy
19 Southerland on November 17, 2017, at 5:00 p.m.

20 WHEREAS, on November 16, 2017, at approximately 12:00 p.m., Mary Melton, counsel
21 for Plaintiff, contacted Nubia Goldstein, counsel for Defendant, via email and telephone
22 informing Defendant's counsel that the depositions of Stephanie Beck and Teresa Stinson would
23 not go forward as scheduled later that day.

24 WHEREAS, on November 16, 2017, at approximately 1:15 p.m., Raymond Ballister,
25 counsel for Plaintiff, contacted Ms. Goldstein informing her that that the depositions of Plaintiff
26 and Cindy Southerland would not go forward as scheduled for the following day. Mr. Ballister
27 indicated that the cancellation was due to Plaintiff's intention to produce additional documents
28 responsive to the requests for production of documents contained within Defendant's notice of

1 deposition of Plaintiff.

2 WHEREAS, on November 16, 2017, counsel for Defendant, Nubia Goldstein, requested
3 an estimated date of production for the additional documents promised in Mr. Ballister's
4 voicemail of that same date.

5 WHEREAS, counsel for Defendant is not available to defend or take depositions between
6 December 4, 2017, and December 15, 2017, due to a trial scheduled in Santa Clara County
7 Superior Court, case number 14-CV-268594.

8 WHEREAS, to date, counsel for Plaintiff has not provided new dates for the four
9 cancelled depositions, nor have they produced the additional documents Mr. Ballister indicated in
10 his voicemail of November 16, 2017, which Plaintiff was still waiting to obtain, and which was
11 the reason for cancelling Plaintiff's and Plaintiff's wife's depositions.

12 WHEREAS, good cause exists for this extension to prevent Defendant from being
13 prejudiced by the delay in deposition scheduling.

14 THEREFORE, the Parties hereby stipulate:

15 1. All discovery shall be completed by February 16, 2018. In this context,
16 "completed" means that all discovery shall have been conducted so that all depositions have been
17 taken and any disputes relative to discovery shall have been resolved by appropriate order if
18 necessary and, where discovery has been ordered, the order has been obeyed. All motions to
19 compel discovery must be noticed on the magistrate judge's calendar in accordance with the local
20 rules of this Court.

21
22 DATED: November 28, 2017

CHURCHWELL WHITE LLP

23
24 By /s/ Nubia I. Goldstein
25 NUBIA I. GOLDSTEIN
26 Attorneys for Defendant
27 *Georgetown Divide Public Utility District*
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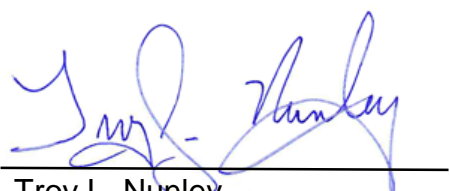
DATED: November 28, 2017

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By: /s/ Sara N. Gunderson
SARA N. GUNDERSON
Attorneys for Plaintiff
Stacy Mecklenberg

IT IS SO ORDERED.

Dated: December 8, 2017



Troy L. Nunley
United States District Judge