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11 *Attorneys for Defendants USA Trucking, Inc.
 12 and Gurtej Singh*

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 14 UNITED STATES DISTRICT COURT
 15 EASTERN DISTRICT OF CALIFORNIA

16 VIRGIL STUCKEY, an individual;

17 Plaintiffs,

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 19 vs.

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 21 U.S.A. TRUCKING, INC., a California
 22 corporation; GURTEJ SINGH, an individual,
 23 and DOES 1 through 50, inclusive,

24 Defendants.

CASE NO. 2:14-cv-01091-JAM-DAD

**STIPULATION TO EXTEND
 DEADLINES AND ORDER FOR:
 DISCOVERY CUT-OFF,
 DISPOSITIVE MOTIONS, PRE-
 TRIAL CONFERENCE, AND TRIAL
 DATE**

25 Pursuant to the Parties' agreement of July 1, 2015, and for the reasons described below,
 26 as well as an effort to continue good faith and ongoing efforts toward informal resolution, the
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1 Parties' hereby agree to continue the deadlines set forth for Discovery, Motions, the Pre-Trial
2 Conference and Trial as described below.

3 Following the Court's April 17, 2015 deadline, the Parties met and conferred regarding
4 Defendants' initial discovery responses. Plaintiff's counsel provided Defendants' counsel time
5 to become caught up with the case and then began requesting amended responses. At the same
6 time, Plaintiff's counsel also began meeting and conferring regarding dates for Defendants'
7 depositions as well as the depositions of their witnesses. Throughout this process, the Parties
8 have made efforts to discuss resolution of this matter in good faith. On or about June 24, 2015,
9 Defendants' counsel informed Plaintiff's counsel for the first time that he would be unavailable
10 from July 4, 2015 through July 26, 2015.

11 On July 1, 2015, during the deposition of Defendant Gurtej Singh, Mr. Singh made
12 reference to documents which he states were provided to his prior counsel and which are
13 responsive to Plaintiff's initial discovery requests. However, Plaintiff has not received those
14 documents. In an effort to have a more meaningful and effective deposition, Plaintiff and
15 Defendants' counsel agreed that Defendants' counsel would provide all documents immediately
16 and in any event no later than July 3, 2015 and that Plaintiff would continue Defendant Gurtej
17 Singh's deposition to July 27, 2015. During that same deposition, Plaintiff and Defendants'
18 counsel were able to make significant headway in negotiations and discussed the use of third
19 party mediation.

20 Based on these facts and ongoing discovery issues related in part to the withdrawal of
21 Defendants' prior counsel, the Parties have agreed to continue the deadlines set forth for
22 Discovery, Motions, the Pre-Trial Conference and Trial as follows: (1) the Discovery Deadline,
23 currently set for August 10, 2015, will be extended to September 11, 2015; (2) Dispositive
24 Motions Deadline, currently set for August 19, 2015 will be extended to September 21, 2015 and
25 the Dispositive Motion hearings, currently set for notice on September 16, 2015 at 9:30 a.m. will
26 be set for October 21, 2015 at 9:30 a.m. ; (3) the Pre-Trial Conference, currently set for
27 December 4, 2015 at 10:00 a.m. will be extended to January 8, 2016 at 10:00 a.m. , with joint
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1 pretrial statements, currently due by November 27, 2015, due on December 30, 2015; (4) the
2 Jury Trial, currently set for January 26, 2016, at 9:00 a.m. will be extended to February 22, 2016
3 at 9:00 a.m.

4 The parties respectfully request the Court enter an order that current deadlines listed
5 above be extended as agreed to by the parties.

6 WHEREAS, Plaintiff and Defendants agreed to the above scheduling changes during a
7 conference during the deposition of Defendant Gurtej Singh on July 1, 2015;

8 THEREFORE, IT IS HEREBY STIPULATED by and between Plaintiff and Defendants
9 through their designated counsel that the above scheduling changes be granted and entered by the
10 Court.

11 IT IS SO STIPULATED.

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13 Dated: July 1, 2015

QUINTANA HANAFI
PUNGPRAKEARTI, LLP

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16 By: /s/Rory C. Quintana
Rory C. Quintana
Attorney for Plaintiff Virgil Stuckey

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19 Dated: July 1, 2015

YULI LAW OFFICES

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21 By: /s/Yuli Kaplunovsky
Yuli Kaplunovsky
Attorney for Defendants Gurtej Singh
and U.S.A. Trucking, Inc.

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24 **Filer's Attestation:** I attest under penalty of perjury that concurrence in the filing of the
25 document has been obtained from its signatory.

26 By: /s/Rory C. Quintana
Rory C. Quintana

1 The Court having considered the stipulation of the parties, and good cause appearing
2 therefore, orders as follows:

- 3 1. The proposed deadlines as described above shall be granted.

4 IT IS SO ORDERED

5 Dated: July 2, 2015

 /s/ John A. Mendez _____
 UNITED STATES DISTRICT COURT JUDGE
 EASTERN DISTRICT OF CALIFORNIA