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 12 and Gurtej Singh*

13
 14 UNITED STATES DISTRICT COURT
 15 EASTERN DISTRICT OF CALIFORNIA

16 VIRGIL STUCKEY, an individual;

17 Plaintiffs,

19 vs.

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**

(AS MODIFIED BY THE COURT)

25 Pursuant to the Parties' agreement of September 10, 2015, and for the reasons described
 26 below, as well as an effort to continue good faith and ongoing efforts toward informal resolution,
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 28

1 the parties' hereby agree to continue the deadlines set forth for Discovery, Motions, the Pre-Trial
2 Conference and Trial as described below.

3 On September 11, 2015, Defendant failed to respond to Plaintiff's second set of
4 discovery. Defendant failed to provide responses to discovery. On October 9, 2015, the Court
5 granted Plaintiff's Motion to Compel responses to Plaintiff's Second Set of Discovery. Plaintiff
6 must receive this discovery in order to complete the depositions of Mr. Singh and the new
7 witnesses that Mr. Singh has only recently disclosed as a part of the meet and confer process.
8 The Court has required Defendant to provide responses by October 23, 2015. Discovery is
9 currently set to close on November 6, 2015. If Defendant waits until the last day to provide
10 responses, Plaintiff will only have two weeks to complete all necessary depositions. To date,
11 Defendant has still not provided Discovery responses.

12 In addition to the issues related to Defendant's failure to participate in the discovery
13 process, Plaintiff's mother passed away on October 11, 2015 and Plaintiff has requested time to
14 mourn the loss of his mother. Additionally, Plaintiff's counsel has also had a personal family
15 emergency which has required him to be in Nashville, Tennessee since October 14, 2015 and
16 will keep him in Nashville through the immediate future.

17 Based on these facts and ongoing discovery issues related in part to the withdrawal of
18 Defendants' prior counsel, the Parties have agreed to continue the deadlines set forth for
19 Discovery, Motions, the Pre-Trial Conference and Trial as follows: (1) the Discovery Deadline,
20 currently set for November 6, 2015, will be extended to February 22, 2016; (2) Dispositive
21 Motions Deadline, currently set for November 20, 2015 will be extended to March 8, 2016 and
22 the Dispositive Motion hearings, currently set for notice on December 10 2015 at 9:30 a.m. will
23 be set for April 5, 2016 at 9:30 a.m. ; (3) the Pre-Trial Conference, currently set for February 12,
24 2016 at 11:00 a.m. will be extended to May 13, 2016 at 11:00 a.m. , with joint pretrial
25 statements, currently due by January 29, 2016, due on May 6, 2016; (4) the Jury Trial, currently
26 set for March 14, 2016, at 9:00 a.m. will be extended to June 13, 2016 at 9:00 a.m.

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

3 WHEREAS, Plaintiff and Defendants agreed to the above scheduling changes following
4 the hearing for Plaintiff's Motion to Compel on October 9, 2015;

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

8 IT IS SO STIPULATED.

9
10 Dated: October 19, 2015

QUINTANA HANAFI
PUNGPRAKEARTI, LLP

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12
13 By: /s/Rory C. Quintana
14 Rory C. Quintana
Attorney for Plaintiff Virgil Stuckey

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17
18 Dated: October 19, 2015

YULI LAW OFFICES

19
20 By: /s/Yuli Kaplunovsky
21 Yuli Kaplunovsky
22 Attorney for Defendants Gurtej Singh
and U.S.A. Trucking, Inc.

23
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
27 Rory C. Quintana
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1 The Court having considered the stipulation of the parties, and good cause appearing
2 therefore, orders modifications as provided above.

3 IT IS SO ORDERED

4 Dated: 10/20/2015

/s/ John A. Mendez

UNITED STATES DISTRICT COURT JUDGE
EASTERN DISTRICT OF CALIFORNIA