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14
 15 UNITED STATES DISTRICT COURT
 16 EASTERN DISTRICT OF CALIFORNIA
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18 VIRGIL STUCKEY, an individual;
 19 Plaintiffs,
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 21 vs.
 22
 23 U.S.A. TRUCKING, INC., a California
 corporation; GURTEJ SINGH, an individual,
 24 and DOES 1 through 50, inclusive,
 25 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**

1 Pursuant to the Parties' agreement of February 22, 2016, and for the reasons described
2 below, as well as an effort to continue good faith and ongoing efforts toward informal resolution,
3 the parties' hereby agree to continue the deadlines set forth for Discovery, Motions, the Pre-Trial
4 Conference and Trial as described below.

5 Following the Court's October 20, 2015 order to extend time, the Parties met and
6 conferred regarding Defendants' discovery responses. The Plaintiff's counsel conducted over
7 five depositions and the Defendant's counsel conducted deposition of the Plaintiff as well. Both
8 parties agreed that more documentary evidence would be needed.

9 Based on these facts and ongoing discovery issues related in part to the fact that
10 Defendant's mother died and he was not available for deposition for few months, the Parties
11 have agreed to continue the deadlines set forth for Discovery, Motions, the Pre-Trial Conference
12 and Trial as follows:

- 13 (1) Discovery Deadline, currently set for 2/22/2016, will be extended to 4/11/2016;
- 14 (2) Dispositive Motions Deadline, currently set for 3/8/2016 will be extended to 5/3/2016
- 15 (3) Dispositive Motion hearings, currently set for notice on 4/5/2016 at 9:30 a.m. will be set for
16 5/31/2016 at 1:30 P.M. ;
- 17 (4) Joint pretrial statements, currently due by 5/6/2016, due on 6/24/2016;
- 18 (5) Final Pre-Trial Conference, currently set for 5/13/2016 at 11:00 a.m. will be extended to
19 7/1/2016 at 11:00 a.m. ,
- 20 (6) Jury Trial, currently set for 6/13/2016, at 9:00 a.m. will be extended to 8/1/2016 at 9:00 a.m.

21
22 The parties respectfully request the Court enter an order that current deadlines listed
23 above be extended as agreed to by the parties.

24 WHEREAS, Plaintiff and Defendants agreed to the above scheduling changes 2/22/2016;
25 THEREFORE, IT IS HEREBY STIPULATED by and between Plaintiff and Defendants
26 through their designated counsel that the above scheduling changes be granted and entered by the
27 Court.

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IT IS SO STIPULATED.

Dated: 2/22/2016

YULI LAW OFFICES

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

Dated: 2/22/2016

QUINTANA HANAFI
PUNGPRAKEARTI, LLP

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

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

By: /s/Yuli Kaplunovsky
Yuli Kaplunovsky

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

1. The proposed deadlines as described above **as modified by the Court** shall be granted.

IT IS SO ORDERED

Dated: 2/23/2016

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