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

13  
 14 UNITED STATES DISTRICT COURT  
 15 EASTERN DISTRICT OF CALIFORNIA

16 VIRGIL STUCKEY, an individual;  
 17  
 18 Plaintiffs,  
 19 vs.  
 20 U.S.A. TRUCKING, INC., a California  
 corporation; GURTEJ SINGH, an individual,  
 21 Defendants.

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

**STIPULATION TO EXTEND DEADLINE  
 FOR: DISPOSITIVE MOTIONS,  
 PRE-TRIAL CONFERENCE, AND  
 TRIAL DATE**

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 23 Pursuant to the Parties' agreement of May 1, 2016, and for the reasons described below, as  
 24 well as an effort to resolve the case through alternative dispute resolution, the Parties' hereby  
 25 agree to continue the deadlines set forth for Dispositive Motions, the Pre-Trial Conference and  
 26 Trial as described below.

27 On April 11, 2016, the Parties stipulated to submit to the Court's Voluntary Dispute  
 28 Resolution Program. Because Defendants' counsel and Defendant were both out of the country

1 for the next three weeks, the stipulation was not filed until May 1, 2016.

2 Plaintiff intends to file a Motion for Summary Adjudication, however both Parties agree  
3 that a pending summary judgment or adjudication motion would be a detriment to resolution  
4 discussions. Given the stipulation for to submit to the Voluntary Dispute Resolution Program,  
5 and the foregoing facts, the Parties have agreed to continue the deadlines set forth for Dispositive  
6 Motions, the Pre-Trial Conference and Trial as follows: (1) Dispositive Motions Deadline,  
7 currently set for May 3, 2016 will be extended to June 21, 2016, and the Dispositive Motions  
8 hearings, currently set for May 31, 2016 will be extended to July 19, 2016 at 1:30 p.m.; (2) the  
9 Pre-Trial Conference, currently set for July 1, 2016 at 11:00 a.m. will be extended to August 26,  
10 2016 at 11:00 a.m.; and JURY TRIAL currently set for August 1, 2016 at 9:00 a.m. will be  
11 extend to September 26, 2016 at 9:00 a.m. in Courtroom 6 before Judge John A. Mendez.

12 The Parties respectfully request the Court enter an order that current deadlines listed above  
13 be extended as agreed to by the Parties.

14 WHEREAS, Plaintiff and Defendants agreed to the above scheduling changes before filing  
15 Motions for Summary Judgment or Adjudication on May 1, 2016;

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

19 IT IS SO STIPULATED

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1 Dated: May 1, 2016

QUINTANA HANAFI  
PUNGPRAKEARTI, LLP

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

5  
6  
7 Dated: May 1, 2016

YULI LAW OFFICES

8  
9 By:    /s/Eliyahu Yuli Kaplunovsky     
Eliyahu Yuli Kaplunovsky  
Attorney for Defendants Gurtej Singh  
and U.S.A. Trucking, Inc.

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11  
12  
13 **Filer's Attestation:** I attest under penalty of perjury that concurrence in the filing of the  
14 document has been obtained by its signatory

15  
16 By:    s/s Rory C. Quintana     
Rory C. Quintana

