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16 *Attorneys for Defendants USA Trucking, Inc.
 17 and Gurtej Singh*

18 UNITED STATES DISTRICT COURT
 19 EASTERN DISTRICT OF CALIFORNIA

20 VIRGIL STUCKEY, an individual;
 21
 22 Plaintiffs,
 23
 24 vs.
 25 U.S.A. TRUCKING, INC., a California
 26 corporation; GURTEJ SINGH, an individual,
 27
 28 Defendants.

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

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

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

On April 11, 2016, the Parties stipulated to submit to the Court's Voluntary Dispute 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 The Parties agreed to an extension of the Dispositive Motion Deadline, the pre-Trial
3 conference and Trial after submission to the VDRP. Because Defendants' counsel was out of the
4 country and failed to notify Plaintiff's counsel of his trip, the Parties were unable to immediately
5 schedule a date with the mediator. The Parties attempted to obtain a date with the mediator
6 originally selected but he was not available until late July at the earliest. The Parties had to be
7 appointed a different mediator and only in the last week were the Parties able to schedule a
8 mediation date for July 6, 2016 in the last week.

9 Plaintiff still intends to file a Motion for Summary Adjudication if mediation is
10 unsuccessful. Given the stipulation for to submit to the Voluntary Dispute Resolution Program,
11 and the foregoing facts, the Parties have agreed to continue the deadlines set forth for Dispositive
12 Motions, the Pre-Trial Conference and Trial as follows: (1) Dispositive Motions Deadline,
13 currently set for June 21, 2016 will be extended to August 9, 2016, and the Dispositive Motions
14 hearings, currently set for July 19, 2016 will be extended to September 6, 2016 at 1:30 p.m.; (2)
15 the Pre-Trial Conference, currently set for August 26, 2016 at 11:00 a.m. will be extended to
16 October 21, 2016 at 10:00 a.m.; and JURY TRIAL currently set for September 26, 2016 at 9:00
17 a.m. will be extend to December 5, 2016 at 9:00 a.m. in Courtroom 6 before Judge John A.
18 Mendez.

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

21 WHEREAS, Plaintiff and Defendants agreed to the above scheduling changes after having
22 the mediation started on July 6, 2016;

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

26 IT IS SO STIPULATED
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3 Dated: July 12, 2016

QUINTANA HANAFI
PUNGPRAKEARTI, LLP

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

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9 Dated: July 12, 2016

YULI LAW OFFICES

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

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

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18 By: /s/Eliyahu Yuli Kaplunovsky
Eliyahu Yuli Kaplunovsky
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