CENTER FOR DISABILITY ACCESS 1 MARK D. POTTER, ESQ., SBN 166317 PHYL GRACE, ESQ., SBN 171771 Mail: P.O. Box 262490 2 San Diego, CA 92196-2490 Deliveries: 9845 Erma Road, Suite 300 3 San Diego, CA 92131 Phone: (858) 375-7385 4 Fax: (888) 422-5191 phylg@potterhandy.com 5 Attorney for Plaintiff SCOTT JOHNSON 6 7 UNITED STATES DISTRICT COURT 8 EASTERN DISTRICT OF CALIFORNIA 9 10 Case No.: 2:14-CV-01256-TLN-KJN SCOTT JOHNSON, 11 STIPULATION TO CONTINUE Plaintiff, **DISPOSITIVE MOTION HEARING CUT-**12 v. 13 DARLENE RAE DOWNES, in her individual and) Pretrial Conference: June 30, 2016 representative capacity as Trustee—Darlene Rae Time: 2:00 p.m. 14 Downes Trust; JEFFRA MCGOWAN; Complaint Filed: December 12, 2013 15 MICHAEL MCGOWAN; and Does 1-10, **Honorable Judge Troy Nunley** Defendants. 16 17 18 19 20 JOINT STIPULATION 21 Plaintiff Scott Johnson and Defendants Darlene Rae Downes, Jeffra McGowen, and Michael 22 McGowan (collectively as "Parties"), jointly request that the court continue the Dispositive Motion 23 Hearing Cut-off Date. 24 Whereas, Plaintiff filed this lawsuit on May 22, 2014; 25 Whereas, the Settlement Conference is currently scheduled for 26 Whereas, the Final Pretrial Conference is currently scheduled for June 30, 2016; 27 Whereas, the deadline for a hearing on Dispositive Motions is currently scheduled for March 20 Joint Stipulation and Order -1-Case No.: 2:14-CV-01256-TLN-KJN

Johnson v. Downes et al

Doc. 19

Dockets.Justia.com

1	24, 2016;	
2	Whereas, Parties are actively negotia	ating settlement and have reached a tentative agreement;
3	Whereas Parties wish to avoid incu	arring unnecessary litigation expenses, but wish to retain
4	the right to bring a dispositive motion at a la	ter date should that become necessary;
5	THEREFORE, in light of the above	ve, the parties respectfully request that the court continue
6	the Dispositive Motion Hearing Cut-off Date	e from March 24, 2016 to May 12, 2016.
7		
8	Dated: February 23, 2016	CENTER FOR DISABILITY ACCESS
9		
10		By:/s/ Christina Sosa CHRISTINA SOSA
11		Attorney for Plaintiff
12		
13	Dated: February 23, 2016	MICHAEL D. WELCH ASSOCIATES
14		
15		By: /s/ Michael Welch MICHAEL D. WELCH
16		Attorney for Defendant
17		
18		
19		
20		
21		
22		
23		
24		
25		
$\begin{bmatrix} 25 \\ 26 \end{bmatrix}$		
20 27		
<i>41</i>		

Case No.: 2:14-CV-01256-TLN-KJN

1	CENTED FOR DISABILITY ACCESS		
2 3	CENTER FOR DISABILITY ACCESS MARK D. POTTER, ESQ., SBN 166317 PHYL GRACE, ESQ., SBN 171771 Mail: P.O. Box 262490		
4	San Diego, CA 92196-2490 Deliveries: 9845 Erma Road, Suite 300		
	San Diego, CA 92131 Phone: (858) 375-7385		
5	Fax: (888) 422-5191 phylg@potterhandy.com		
6			
7	Attorney for Plaintiff SCOTT JOHNSON		
8	UNITED STATES DISTRICT COURT		
9	EASTERN DISTRICT OF CALIFORNIA		
10			
11) Case No.: 2:14-CV-01256-TLN-KJN SCOTT JOHNSON,		
12)		
13	Plaintiff, V. ORDER		
14	DARLENE RAE DOWNES, in her individual and)		
15	representative capacity as Trustee—Darlene Rae Downes Trust; Downes Trust;		
16	JEFFRA MCGOWAN; and Does 1-10,		
17	Defendants.		
18			
19	OPDED		
20	ORDER		
21	Pursuant to joint stipulation of the parties, and finding good cause therefore, is hereby ordered		
22	a continuance of the Dispositive Motion Hearing Cut-off to May 12, 2016.		
23	IT IS SO ORDERED.		
24			
25	Dated: February 25, 2016		
26	The state of the s		
27	Troy L. Nunley United States District Judge		
30			

-3-

Case No.: 2:14-CV-01256-TLN-KJN

Joint Stipulation and Order