

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

ROBERT MROTZ, PATRICIA HAMAN

Case. No. 2:14-cv-01271-JAM-CKD

Plaintiffs,

STIPULATION AND ORDER TO  
EXTEND DISCOVERY AND  
EXPERT WITNESS DISCLOSURE  
DATES

v.

NATIONAL RAILROAD PASSENGER  
CORPORATION, dba AMTRAK; UNION  
PACIFIC RAILROAD COMPANY and  
DOES 1 to 100

Defendants.

\_\_\_\_\_  
Jacob D. Flesher, Esq. CSB # 210565  
Jeremy J. Schroeder, Esq. CSB # 223118  
Flesher McKague, LLP  
Attorneys for Defendants  
193 Blue Ravine Road, Suite 265  
Folsom, CA 95630  
FAX (916) 673-9672  
\_\_\_\_\_

Gregory J. Brod CSB # 184456  
BROD LAW FIRM, P.C.  
Attorneys for Plaintiffs  
96 Jessie Street  
San Francisco, CA 94105  
FAX (415) 397-2121

Plaintiffs ROBERT MROTZ and PATRICIA HAMAN AND make the following  
Defendants, the NATIONAL RAILROAD PASSENGER CORPORATION, doing  
business as AMTRAK (hereinafter "AMTRAK") and UNION PACIFIC RAILROAD  
COMPANY (hereinafter "UPRR"), by and thorough their respective attorneys, and  
jointly stipulate as follows:

1. On or about July 25, 2014, this Court ordered the parties to designate expert witnesses on January 16, 2105 and expert rebuttal by January 23, 2015. In addition, all discovery was to be completed by March 13, 2015;
2. Counsel for defendants, Jacob Flesher and Jeremy Schroeder, were engaged in a civil trial from November 3, 2014 through December 11, 2014, which has impacted the parties ability to exchange discovery and prepare for expert disclosures as they are currently set. The parties have agreed that a continuation of the discovery dates below would be beneficial to all parties involved;
3. The parties have exchanged initial disclosures, pursuant to FRCP 26(a)(1), and have been “meeting and conferring” over the course of several months regarding documents, primarily due to the trial schedules of counsel for all parties;
4. The parties have agreed to the following dates:
  - a. Designation of Expert Witnesses: March 12, 2105;
  - b. Expert Rebuttal due by: March 20, 2015;
  - c. Discovery to be completed by: April 10, 2015.

DATED: December \_\_\_\_, 2014

BROD LAW FIRM, PC.

By \_\_\_\_\_  
GREGORY J. BROD, ESQ.  
Attorneys for plaintiffs  
ROBERT MROTZ and  
PATRICIA HAMAN

DATED: December \_\_\_\_, 2014

FLESHER MCKAGUE LLP

By \_\_\_\_\_  
JACOB D. FLESHER, ESQ.  
JEREMY J. SCHROEDER, ESQ.  
Attorneys for defendants,  
NATIONAL RAILROAD PASSENGER  
CORPORATION dba AMTRAK, and  
UNION PACIFIC RAILROAD COMPANY

DATED: 12/16/2014

/s/ John A. Mendez  
JUDGE OF THE U.S. DISTRICT COURT