

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.

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Jacob D. Flesher, Esq. CSB # 210565  
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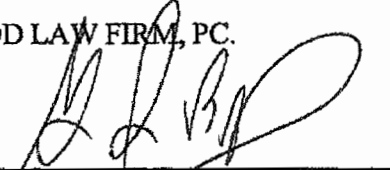
Plaintiffs ROBERT MROTZ and PATRICIA HAMAN AND make the following  
Defendants, the NATIONAL RAILROAD PASSENGER CORPORATION, doing  
business as AMTRAK (hereinafter "AMTRAK") and UNION PACIFIC RAILROAD  
COMPANY (hereinafter "UPRR"), by and thorough their respective attorneys, and  
jointly stipulate as follows:

1. On or about July 25, 2014, this Court ordered the parties to designate expert witnesses on March 12, 2015 and expert rebuttal by March 20, 2015. In addition, all discovery was to be completed by April 10, 2015;
2. Counsel for the parties have been exchanging information and documents informally and formally, have agreed to prioritize certain depositions and have otherwise worked cooperative to ready this matter for the settlement conference requested of the Court, set for March 6, 2015. The parties have, therefore, endeavored to ready the case while keeping costs and cooperation in mind;
3. The parties have exchanged initial disclosures, pursuant to FRCP 26(a)(1), and have been exchanging documents and information as part of the discovery process, but several depositions and expert work will be needed if the matter cannot be resolved;
4. For these reasons, the parties have agreed that a continuation of the discovery dates below would be beneficial to all parties involved; and,
5. The parties have agreed to the following dates:
  - a. Designation of Expert Witnesses: April 13, 2015;
  - b. Expert Rebuttal due by: April 20, 2015;
  - c. Discovery to be completed by: May 11, 2015.

DATED: February 23, 2015

BROD LAW FIRM, PC.

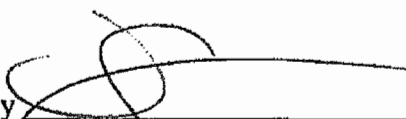
By

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

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DATED: February 24, 2015

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

  
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JUDGE OF THE U.S. DISTRICT COURT