

PORTER | SCOTT
350 University Avenue, Suite 200
Sacramento, CA 95825
TEL: 916.929.1481
FAX: 916.927.3706

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

PORTER | SCOTT
A PROFESSIONAL CORPORATION
David A. Melton, SBN 176340
Colleen R. Howard, SBN 257661
350 University Avenue, Suite 200
Sacramento, California 95825
TEL: 916.929.1481
FAX: 916.927.3706

Attorneys for Defendants
J.C. PENNEY CORPORATION, INC. fka J.C. PENNEY COMPANY, INC.

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

CAROL GAONA,

Plaintiff,

v.

J.C. PENNEY COMPANY, INC.; J.C.
PENNEY CORPORATION, INC.; DOW
ROOFING SYSTEMS, LLC, fka JPS
ELASTOMERICS CORPORATION dba
STEVENS ROOFING SYSTEMS;
JOHNSON CONTROLS, INC., and DOES
1 through 25, inclusive,

Defendants.

CASE NO. 2:14-CV-02051-TLN-AC

**STIPULATION AND ORDER FOR
DEADLINE TO COMPLETE ALL
EXPERT DISCOVERY**

Complaint Filed: July 17, 2014
Removal: September 4, 2014
Trial: May 14, 2018
Judge: Hon. Troy L. Nunley

ALL RELATED CROSS-ACTIONS

Plaintiff CAROL GAONA and defendants/cross-defendants J.C. PENNEY COMPANY,
INC. fka J.C. PENNEY CORPORATION (“JCP”), DOW ROOFING SYSTEMS, LLC fka JPS
ELASTOMERICS CORPORATION dba STEVENS ROOFING SYSTEMS (“DOW”), and
JOHNSON CONTROLS, INC. (“JOHNSON”), by and through their attorneys of record,

1 respectfully submit this joint stipulation and proposed order to specify a date for the completion of
2 all expert discovery.

3 On May 11, 2016, this Court issued its Amended Pretrial Scheduling Order (“Order”).
4 (Doc. 41.) The Order stated, “Counsel are instructed to complete all discovery of expert witnesses
5 in a timely manner in order to comply with the Court’s deadline for filing dispositive motions.”
6 (Doc. 41 at p. 4.) The deadline to file a dispositive motion is December 14, 2017. (Doc. 41 at p. 4.)

7 After receiving the Order, the parties met and conferred and mutually agreed to complete
8 all expert discovery by November 9, 2017.

9 IT IS STIPULATED THAT all expert discovery will be completed by November 9, 2017.

10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Dated: July 14, 2016

PORTER SCOTT
A PROFESSIONAL CORPORATION

By /s/ Colleen R. Howard
Colleen R. Howard
Attorney for Defendant
J.C. PENNEY CORPORATION, INC. fka
J.C. PENNEY COMPANY, INC.

Dated: July 14, 2016

ERICKSEN ARBUTHNOT

By /s/ Charles S. Painter (as authorized on 7/19/16)
Charles S. Painter
Graham M. Cridland
Attorneys for Defendant
JOHNSON CONTROLS, INC.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Dated: July 14, 2016

BARNES & THORNBURG LLP

By /s/ Matthew B. Barr (as authorized on 7/20/16)
Robert D. MacGill
Matthew B. Barr
Joel L. Meyer
Attorneys for Defendant
DOW ROOFING SYSTEMS, LLC

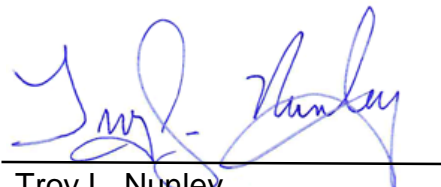
Dated: July 14, 2016

SEVEY, DONAHUE & TALCOTT, LLP

By /s/ Jeffrey C. Sevey (as authorized on 7/15/16)
Jeffrey C. Sevey
Attorney for Plaintiff
CAROL GAONA

IT IS SO ORDERED.

Dated: July 28, 2016



Troy L. Nunley
United States District Judge