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

10	EZELL ANDERSON, JR., Doing Business As,)	
11	Mom’s Choice Meats,)	Case No. 2:14-cv-02307 JAM/CKD
	Plaintiff,)	
12	v.)	STIPULATION TO CONTINUE
		SCHEDULING ORDER DATES;
13		ORDER
14	UNITED STATES OF AMERICA; KEVIN)	
15	CONCANNON, Undersecretary for Food,)	
16	Nutrition and Consumer Services; UNITED)	
17	STATES DEPARTMENT OF)	
18	AGRICULTURE; JOCELYN KEH, Section)	
19	Chief, Supplemental Nutrition Assistance)	
	Program, Food and Nutrition Service, United)	
	States Department of Agriculture, and their)	
	successors in office, ,)	
	Defendants.)	

20 Plaintiff Ezell Anderson, Jr., doing business as, Mom’s Choice Meats (“Plaintiff”), and
 21 Defendant United States (“Defendant”), (collectively “the parties”), stipulate, by and through the
 22 undersigned counsel, to extend the expert and discovery dates in this action to allow for newly
 23 associated counsel on behalf of Plaintiff to become familiar with the matter. Additionally, good
 24 cause exists for this brief extension of the discovery and expert report dates as the parties
 25 meaningfully engaged in settlement negotiations, including but not limited to two settlement
 26 conferences, with Magistrate Judge Delaney. Despite the efforts of the parties and the court,
 27 settlement was not achieved, and the parties are now diligently pursuing written discovery and
 28 depositions for which a brief extension of the expert and discovery dates is required.

1 The parties submit that this request is being made for good cause as newly associated counsel
2 needs time to learn the matter and the parties were unsuccessful in their attempt to resolve the case
3 prior to extensive discovery, depositions and pre-trial disclosures. This stipulation does not affect
4 any other dates in the Scheduling Order (Docket No. 19).

5 Accordingly, the parties stipulate and agree to continue the following dates, and base it on the
6 above-stated good cause.

	Old Date	New Date	
7			
8	Expert Disclosure	October 17, 2015	December 2, 2015
9	Supplemental Expert Disclosure	October 30, 2015	December 15, 2015
10	Discovery Cut-Off	January 8, 2016	January 26, 2016

11 The parties request the court to endorse this stipulation by way of formal order.

12 Dated: September 29, 2015

Respectfully submitted,

13 BENJAMIN B. WAGNER
14 UNITED STATES ATTORNEY

15 /s/Alyson A. Berg
16 ALYSON A. BERG
17 Attorney for Defendant United States

18 Dated: September 29, 2015

BISCETTE AND ASSOCIATES, P.C.

19 (As authorized 09/29/15)
20 /s/Nasiche Beatrice Biscette
21 NASICHE BEATRICE BISCETTE
22 Attorneys for Plaintiff

23 ORDER

24 Having reviewed the stipulation submitted by the parties, the dates are continued as
25 referenced above.

26 Dated: September 30, 2015

/s/ John A. Mendez
27 John A. Mendez
28 United States District Court Judge