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6 Attorneys for Defendants
SUPERIOR COURT OF CALIFORNIA,
7 COUNTY OF SHASTA (erroneously sued herein as
SHASTA COUNTY MARSHAL'S OFFICE), and JOEL DEAN
8

9 UNITED STATES DISTRICT COURT
10 EASTERN DISTRICT OF CALIFORNIA
11

12 JAIME SCHMIDT, DEBRA KNOWLES,
ELIZABETH SAMPSON, AND RYAN
13 HENRIOULLE,

14 Plaintiffs,

15 v.

16 SHASTA COUNTY MARSHAL'S OFFICE
AND JOEL DEAN,

17 Defendants.
18

Case No. 2:14-CV-02471-MCE

**AMENDED¹ JOINT STIPULATION AND
ORDER TO CONTINUE PRETRIAL
DEADLINES**

19 Pursuant to Federal Rule of Civil Procedure 16(b) and Eastern District Local Rule 143,
20 Defendants Superior Court of California, County of Shasta² and Joel Dean (collectively, "Defendants")
21 and Plaintiffs Jaime Schmidt, Debra Knowles, Elizabeth Sampson and Ryan Henriouille ("Plaintiffs")
22 hereby stipulate and agree as follows.

23 WHEREAS, on October 21, 2014, Plaintiffs filed their Complaint (Docket No. 1) in this action.
24 In their Complaint, Plaintiffs allege that, while employed in the Marshal's Office of the Superior Court of
25 California, County of Shasta, they were subjected to discrimination, harassment and retaliation, in

26 _____
27 ¹ This amended stipulation and proposed order supersedes the stipulation and proposed order filed on
November 17, 2015 (Docket No. 13), in order to cure certain typographical errors in that document
pertaining to the proposed, new pretrial dates.

28 ² Erroneously sued herein as Shasta County Marshal's Office.

1 violation of federal and state discrimination laws.

2 WHEREAS, on December 12, 2014, Defendants filed an Answer (Docket No. 6) to Plaintiffs’
3 Complaint, denying Plaintiffs’ claims in their entirety and asserting a variety of separate and additional
4 defenses.

5 WHEREAS, on April 10, 2015, the Court issued a Pretrial Scheduling Order (Docket No. 10),
6 setting various pretrial and trial deadlines, including a January 22, 2016 deadline for completing
7 discovery and a July 14, 2016 deadline for hearing any dispositive motions.

8 WHEREAS, to date, the parties have completed some discovery in this matter. For example, in
9 June 2015, the parties exchanged initial disclosures. Moreover, in September 2015, Defendants
10 propounded some written discovery on Plaintiffs, to which Plaintiffs, after receiving a three-week
11 extension, recently responded to.

12 WHEREAS, due to the fact that there are four individual Plaintiffs (each with their own separate
13 sets of employment histories, factual allegations and legal claims), the parties do not believe they will be
14 able to complete discovery in this matter by the January 22, 2016 deadline. This is particularly so given
15 that in order to complete discovery by the current deadline, the parties would have to complete all
16 depositions within the next two months (notwithstanding the upcoming holidays).

17 WHEREAS, the parties anticipate that additional time will assist in their respective prosecution
18 and defense of this action and wish to continue the pretrial deadlines set forth in the Court’s Pretrial
19 Scheduling Order by approximately 90 days (see chart below). In light of the above circumstances, and
20 given that neither party has previously requested an extension of any of the pretrial dates set in this
21 matter, pursuant to Rule 16(b)(4) good cause exists for the relief requested herein.

22 NOW THEREFORE, based on the foregoing, the parties respectfully request that the Court
23 continue the pretrial deadlines in the following manner:

Subject	Current Deadline	Proposed New Deadline
Discovery Cut-Off	January 22, 2016	April 22, 2016
Settlement Conference Statements	February 11, 2016	May 12, 2016
Settlement Conference	February 18, 2016	May 19, 2016
Disclosure of Expert Witnesses	March 23, 2016	June 23, 2016

Dispositive Motions	July 14, 2016	October 20, 2016
Joint Final Pretrial Conference Statement	November 9, 2016	January 19, 2017
Evidentiary/Procedural Motions	November 9, 2016	January 19, 2017
Trial Briefs	November 16, 2016	January 26, 2017
Final Pretrial Conference	December 1, 2016	February 9, 2017
Trial	January 23, 2017	April 3, 2017

IT IS SO STIPULATED.

Dated: December 1, 2015

RENNE SLOAN HOLTZMAN SAKAI LLP

By: /s/ Timothy G. Yeung
Timothy G. Yeung
Attorneys for Defendants

Dated: December 1, 2015

LAW OFFICES OF ANTHONY J. POIDMORE


By: /s/ Anthony J. Poidmore (as authorized on 11/17/15)
Anthony J. Poidmore
Attorney for Plaintiffs

ORDER

The Court adopts the parties' stipulation, with the dates modified by the Court, as its order.

IT IS SO ORDERED.

Dated: December 1, 2015


MORRISON C. ENGLAND, JR., CHIEF JUDGE
UNITED STATES DISTRICT COURT