

1 DAVID YEREMIAN & ASSOCIATES, INC.
 David H. Yeremian (SBN 226337)
 2 david@yeremianlaw.com
 Michele Jackson (SBN 209841)
 3 Michele@yeremianlaw.com
 4 535 North Brand Boulevard, Suite 705
 Glendale, California 91436
 5 Telephone: (818) 230-8380
 Facsimile: (818) 230-0308

6 Attorneys for Plaintiff LAURA EMERTON

8 Sarah R. Nichols, CA Bar No. 233099
 sarah.nichols@ogletreedeakins.com
 9 Victoria L. Tallman, CA Bar No. 273252
 victoria.tallman@ogletreedeakins.com
 10 OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.
 SteuartTower, Suite 1300
 11 One MarketPlaza
 San Francisco, CA94105
 12 Telephone: 415.442.4810
 Facsimile: 415.442.4870

13 Attorneys for Defendants
 14 CLEAN HARBORS INDUSTRIAL SERVICES, INC.;
 And CLEAN HARBORS, INC.

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

19 LAURA EMERTON,

20 Plaintiff,

21 vs.

22 CLEAN HARBORS, INC., A CALIFORNIA
 CORPORATION; AND DOES 1 THROUGH
 23 50, INCLUSIVE,

24 Defendants.

Case No. 2:14-cv-02658-TLN-DAD

**STIPULATION AND ORDER SEEKING TO
 MODIFY PRE-TRIAL SCHEDULING
 ORDER**

Action Filed: October 3, 2014
 Trial Date: October 3, 2016

26 Plaintiff Laura Emerton (“Plaintiff”) and Defendants Clean Harbors Industrial Services,
 27 Inc. and Clean Harbors, Inc. (collectively “Defendants”), by and through their undersigned
 28 counsel, hereby stipulate as follows:

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

STIPULATION

A. WHEREAS, the Honorable Judge Troy L. Nunley issued a Pre-Trial Scheduling Order in this matter dated March 25, 2015;

B. WHEREAS, the March 25, 2015 Pre-Trial Scheduling Order calls for discovery to close on November 5, 2015;

C. WHEREAS, the March 25, 2015 Pre-Trial Scheduling Order calls for the disclosure of expert witnesses to occur on January 7, 2016;

D. WHEREAS, although they have acted with due diligence, neither party has completed discovery and in the interest of promoting meaningful litigation through discovery, the parties seek to amend the March 25, 2015 Pre-Trial Scheduling Order to allow discovery to continue until February 13, 2016 and to exchange expert witness information on or before April 3, 2016;

IT IS HEREBY STIPULATED:

1. The Parties wish to amend the Pre-Trial Scheduling Order to permit discovery to continue until a Discovery Close date of February 13, 2016.
2. The Parties wish to amend the Pre-Trial Scheduling Order with regard to Disclosure of Expert Witnesses to occur on or before April 3, 2016.
3. All other dates in the March 25, 2015 Pre-Trial Scheduling Order are to remain unchanged.

DATED: November 3, 2015

DAVID YEREMIAN & ASSOCIATES, INC.

By /s/Michele Jackson
 David Yeremian
 Michele L. Jackson
 Attorneys for Plaintiff
 LAURA EMERTON

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: November 3, 2015

OGLETREE, DEAKINS, NASH, SMOAK &
STEWART, P.C.

By: /s/Victoria L. Tallman
Sarah R. Nichols
Victoria L. Tallman
Attorneys for Defendant
CLEAN HARBORS INDUSTRIAL
SERVICES, INC. and CLEAN HARBORS,
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

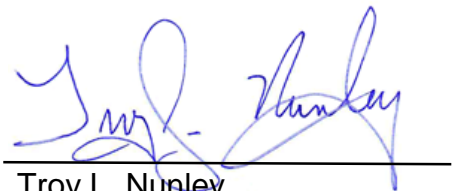
ORDER

The Court having reviewed the foregoing Stipulation, and good cause appearing therefore:

IT IS HEREBY ORDERED that the March 25, 2015 Pre-Trial Scheduling Order be modified to reflect that Discovery in this matter shall be completed on February 13, 2016 and that Disclosure of Expert Witness Information shall occur on or before April 3, 2016. All other dates and information in the March 25, 2015 Pre-Trial Scheduling Order shall remain unchanged.

IT IS SO ORDERED.

Dated: November 3, 2015



Troy L. Nunley
United States District Judge