

Mark A. Vegh, SBN 173414
Tyler Lalaguna, SBN 223028
WELLS, SMALL, FLEHARTY & WEIL
A Law Corporation
292 Hemsted Drive
P.O. Box 991828
Redding, CA 96099-1828
(530) 223-1800
Fax: (530) 223-1809

Attorneys for Defendant Marsha A. Rolfe, a sole proprietor, dba End Zone Bar and Grill

Galen T. Shimoda (Cal. State Bar No. 226752)
Justin P. Rodriguez (Cal. State Bar No. 278275)
Shimoda Law Corp.
9401 East Stockton Blvd., Suite 200
Elk Grove, CA 95624
Telephone: (916) 525-0716
Fax: (916) 760-3733

Attorneys for Plaintiff Peace Mano

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

PEACE MANO, an individual,)	Case No. 2:14-CV-02919-GEB-CMK
)	
Plaintiff)	STIPULATION AND [PROPOSED]
)	EXTENDING PERCIPIENT
vs.)	
)	
MARSHA A. ROLFE, a sole proprietor,)	
d/b/a END ZONE BAR AND GRILL; and)	
DOES 1 to 100, inclusive,)	
)	
Defendant)	
_____)	

This Stipulation and [Proposed] Order is based on the following facts:

1. Pursuant to the Court's February 13, 2015 Scheduling Order, the discovery cutoff date in this matter is currently set for November 19, 2015.

2. The parties desire to extend the cutoff for discovery for one month. The extension of the closure date for discovery is necessary because the parties have had extensive settlement discussions, which have delayed the taking of the depositions of Plaintiff and Defendant's key employees. The parties respectfully request a one-month extension of the discovery cutoff date so that counsel for both Plaintiff and Defendant can take key witness depositions, while the parties continue to discuss potential settlement.

3. No prior continuances have been requested in this matter.

Based upon the foregoing, in order to facilitate this continuing discovery and evaluation of the case, Plaintiff, Peace Mano, and Defendant, Marsha A. Rolfe, dba End Zone Bar and Grill, hereby stipulate and seek an order of the Court modifying the Court's February 13, 2015 Scheduling Order as follows:

(1) The parties will complete discovery on or before December 19, 2015, and

(2) All other dates contained within the February 13, 2015 Scheduling Order or otherwise previously modified are to remain as ordered and are unmodified, altered, or changed.

This Stipulation may be executed in counter-part and faxed and/or authorized electronic signature shall be deemed the same as an original execution.

Dated: November 4, 2015

WELLS, SMALL, FLEHARTY & WEIL

By: /s/ Mark A. Vegh

Mark A. Vegh, Esq.
Tyler Lalaguna, Esq.
Attorneys for Defendant Marsha A. Rolfe
d/b/a End Zone Bar and Grill

Dated: November 4, 2015

SHIMODA LAW CORP.

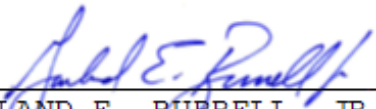
By: /s/ Justin P. Rodriguez

(As authorized on 11/4/15)
Galen T. Shimoda, Esq.
Justin P. Rodriguez, Esq.
Attorneys for Plaintiff

PURSUANT TO THE ABOVE STIPULATION, IT IS HEREBY ORDERED THAT:

- (1) The parties will complete discovery on or before December 19, 2015; and
- (2) All other dates contained within the February 13, 2015 Scheduling Order or otherwise previously modified are to remain as ordered and are unmodified, altered, or changed.

Dated: November 12, 2015



GARLAND E. BURRELL, JR.
Senior United States District Judge