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9 Attorneys for Defendant, 30th DISTRICT AGRICULTURAL ASSOCIATION

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

12 RICHARD HAMMOND ,
13 Plaintiff,

CASE NO.: 2:15-CV-0068-TLN-CMK

14 v.

15 **JOINT STIPULATION FOR**
16 **CONTINUANCE OF PRE-TRIAL DATES**
17 **AND ORDER**

18 COUNTY OF TEHAMA; 30TH DISTRICT
19 AGRICULTURAL ASSOCIATION, a state
20 institution of the State of California and DOES
21 1-10, inclusive.

Complaint Filed: 1/12/2015

22 Defendants.

23 WHEREAS, Defendant 30TH DISTRICT AGRICULTURAL ASSOCIATION (“30TH DAA),
24 and Plaintiff RICHARD HAMMOND (“HAMMOND”) by and through their respective counsel of
25 record hereby agree as follows:

- 26 1. WHEREAS, on or about January 12, 2015, HAMMOND filed his original Complaint;
- 27 2. WHEREAS, on or about April 10, 2015, the parties agreed to participate in the Voluntary
28 Dispute Resolution Program (“VDRP”). The parties could not reach an agreement;
- 3. WHEREAS, on October 22, 2015, the parties filed a Joint Scheduling Report;
- 4. WHEREAS, on December 7, 2015, the Court entered its Pre-Trial Scheduling Order;

- 1 5. WHEREAS, the parties have been engaged in discovery in the above-captioned action,
2 including written discovery, production of documents, and depositions;
- 3 6. WHEREAS, HAMMOND obtained a stipulation from 30th DAA to file a First-Amended
4 Complaint to add an additional defendant, RED BLUFF ROUND-UP ASSOCIATION,
5 which was previously omitted from the complaint;
- 6 7. WHEREAS, on July 22, 2016, the Court granted Plaintiff's Motion for Leave to Amend
7 Complaint to join additional Defendant, RED BLUFF ROUND-UP ASSOCIATION;
- 8 8. WHEREAS, Plaintiff will file his First Amended Complaint no later than July 29, 2016;
- 9 9. WHEREAS, Parties anticipate the Court will vacate the due dates and hearing dates set in
10 the current Pretrial Scheduling Order once Plaintiff files the First Amended Complaint;
- 11 10. WHEREAS, this case is set for trial on May 8, 2017;
- 12 11. WHEREAS, Parties continue to engage in discovery;
- 13 12. WHEREAS, Parties submit there is good cause to continue the pretrial deadlines identified
14 herein by approximately 60 days to allow parties to complete remaining discovery in this
15 matter;
- 16 13. WHEREAS, Parties are only seeking a continuance of those dates identified below and are
17 not seeking a continuance of the trial date in this matter; and
- 18 14. WHEREAS, the Parties have previously requested an extension to conduct a deposition
19 after the discovery cutoff date, but have not requested a continuance of any of the other
20 pretrial dates set by the Court in this matter.

21
22 **STIPULATION:**

23 NOW THEREFORE, it is agreed and stipulated by and between the parties, through their
24 respective counsel of record, that the follow dates previously set by order of the Court be continued
25 as follows:

- 26 • The deadline for Expert Disclosure shall be continued from August 11, 2016 to **October 11,**
27 **2016.**

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- The deadline for Rebuttal Expert Disclosure shall be continued from August 31, 2016 to **October 31, 2016.**
- The deadline for completing Expert Discovery shall be continued from September 30, 2016 to **November 30, 2016.**
- The deadline for filing Dispositive Motions shall be continued from November 7, 2016 to **December 12, 2016.**
- The Dispositive Motions Hearing Date shall be continued from December 8, 2016 to **January 12, 2017.**

The Final Pretrial hearing date (March 9, 2017) and date for commence of Jury Trial (May 8, 2017) shall remain as previous scheduled by the Court, unless the Court orders otherwise after reviewing and considering the above stipulation.

IT IS SO STIPULATED.

Dated: July 25, 2016

PORTER SCOTT
A PROFESSIONAL CORPORATION

By/s/ Hovannes Nalbandyan
Steven E. Horan
Hovannes G. Nalbandyan
Attorneys for Defendant
CITY OF LINCOLN

Dated: July 24, 2016

CENTER FOR DISABILITY ACCESS

By /s/ Amanda Lockhart (authorized)
Amanda Lockhart
Attorney for Plaintiff
RICHARD HAMMOND

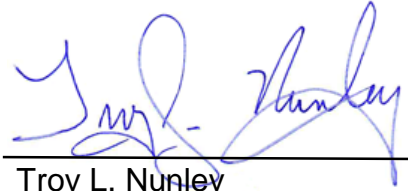
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ORDER

Good cause appearing, PURSUANT TO THE STIPULATION, IT IS HEREBY ORDERED that the Pretrial Dates in this matter shall be continued as set forth in the stipulation above.

Dated: July 28, 2016



Troy L. Nunley
United States District Judge