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21 **UNITED STATES DISTRICT COURT**

22 **EASTERN DISTRICT OF CALIFORNIA**

23 RICARDO CASTILLO, individually and on
 24 behalf of all others similarly situated,

25 Plaintiff,

26 v.

27 ADT LLC and DOES 1–100, inclusive,

28 Defendants.

Case No. 2:15-cv-00383-WBS-DAD

**JOINT STIPULATION REGARDING CASE
 SCHEDULE; [PROPOSED] ORDER**

Complaint Filed: February 17, 2015
 Trial Date: October 18, 2016

1 Defendant ADT LLC (hereinafter, “Defendant”) and Plaintiff Ricardo Castillo (hereinafter,
2 “Plaintiff”) (collectively, the “Parties”) respectfully submit this Joint Stipulation Regarding Case
3 Schedule pursuant to page 2, lines 13-24 of the Court’s July 28, 2015 Order denying Defendant’s
4 Motion to Dismiss or Stay, and the discussion at the hearing on said motion.

5 WHEREAS, in its June 3, 2015 Status (Pretrial Scheduling) Order (Document 019), the
6 Court set the following schedule:

7	Expert Disclosures Due:	October 15, 2015
8	Rebuttal Expert Disclosures Due:	November 23, 2015
9	All Discovery Completed:	March 1, 2016
10	Motion for Class Cert. (filed):	May 2, 2016
11	Other Motions (filed):	June 13, 2016
12	Pretrial Conference:	August 29, 2016 at 2:00 p.m.
13	Jury Trial:	October 18, 2016 at 9:00 a.m.

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15 WHEREAS, in its July 28, 2015 Order on Defendant’s Motion to Dismiss/Stay (Document
16 025), the Court stated that the parties may submit a stipulation for the court’s approval to modify
17 the scheduling order.

18 WHEREAS, the parties wish to modify the scheduling order as follows:

19	Expert Disclosures Due:	March 7, 2016
20	Rebuttal Expert Disclosures Due:	March 21, 2016
21	All Discovery Completed:	April 4, 2016 ¹
22	Motion for Class Cert. (filed):	May 2, 2016
23	Other Motions (filed):	June 13, 2016
24	Pretrial Conference:	<u>August 29, 2016 at 2:00 p.m.</u>
25	Jury Trial:	<u>October 18, 2016 at 9:00 a.m.</u>

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28 ¹ The parties stipulate that they will cooperate to ensure that expert depositions may take place as appropriate during the time period from March 7, 2016 to April 4, 2016.

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NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the parties.

DATED: September 23, 2015

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

By: /s/ Christopher M. Ahearn

Linda Claxton
Christopher M. Ahearn
Rachel J. Moroski

Attorneys for Defendant
ADT LLC

DATED: September 23, 2015

HARRIS & RUBLE

By: /s/ Alan Harris (as authorized on 9/23/15)

Alan Harris
Priya Mohan

DATED: September 23, 2015

NORTH BAY LAW GROUP

By: /s/ David S. Harris (as authorized on 9/23/15)

David S. Harris

Attorneys for Plaintiff
RICARDO CASTILLO

ORDER

Good cause appearing, IT IS SO ORDERED.

Dated: September 24, 2015



WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE