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16 Attorneys for Plaintiff RICARDO CASTILLO

17 **UNITED STATES DISTRICT COURT**

18 **EASTERN DISTRICT OF CALIFORNIA**

19 RICARDO CASTILLO, individually and on  
20 behalf of all others similarly situated,

21 Plaintiff,

22 v.

23 ADT LLC and DOES 1–100, inclusive,

24 Defendants.

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

**JOINT STIPULATION REGARDING CASE  
SCHEDULE**

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.

4 WHEREAS, in its July 28, 2015 Order on Defendant's Motion to Dismiss/Stay (Document  
5 025), the Court stated that the parties may submit a stipulation for the court's approval to modify  
6 the scheduling order. Pursuant that July 28, 2015 Order, the parties submitted a stipulation and on  
7 September 24, 2015, the Court entered an order modifying the scheduling as follows:

8	Expert Disclosures Due:	March 7, 2016
9	Rebuttal Expert Disclosures Due:	March 21, 2016
10	All Discovery Completed:	April 4, 2016
11	Motion for Class Cert. (filed):	May 2, 2016
12	Other Motions (filed):	June 13, 2016
13	Pretrial Conference:	August 29, 2016 at 2:00 p.m.
14	Jury Trial:	October 18, 2016 at 9:00 a.m.

15  
16 WHEREAS, since the Court entered the Order dated September 23, 2015, the parties have  
17 engaged in discovery. The discovery in this matter involves voluminous pay records for a large  
18 number of employees over a several year period. Defendant ADT has been working diligently in  
19 order to obtain and produce relevant discovery;

20 WHEREAS, the parties have identified the documentation and data most relevant to the  
21 claims in this action and the parties have agreed to an exchange of a sample of this documentation  
22 and data in order to participate in a mediation;

23 WHEREAS, the parties initially had some difficulty finding a mutually convenient date for  
24 mediation but have now, in good faith, set a mediation date of March 24, 2016 with mediator Alan  
25 Berkowitz, at the Judicate West offices in San Francisco; and

26  
27 WHEREAS, in order to allow the parties to prepare for and participate in the mediation, the  
28 parties mutually request that the Court continue certain deadlines in this matter in order to engage

1 in the mediation process. Specifically, the parties wish to modify the scheduling order and  
2 continue the following deadlines by 120 days, as follows:

3           Expert Disclosures Due:                   July 7, 2016  
4           Rebuttal Expert Disclosures Due:       July 21, 2016  
5           All Discovery Completed:                August 4, 2016  
6           Motion for Class Cert. (filed):           September 2, 2016  
7           Other Motions (filed):                   October 13, 2016

8           WHEREAS, the Pretrial Conference is currently scheduled to take place on August 29,  
9 2016 at 2:00 p.m., and a Jury Trial is scheduled to begin on October 18, 2016, at 9:00 a.m. To the  
10 extent the parties' mediation proves unsuccessful, the parties respectfully request that the Court  
11 similarly continue by 120 days the dates of the Pretrial Conference and Jury Trial, to a date that is  
12 convenient for the Court.  
13

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

15 DATED: January 29, 2016

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

17 By:           /s/ Alec Hillbo            
18       Linda Claxton  
19       Alec Hillbo

20 Attorneys for Defendant  
ADT LLC

21 DATED: January 29, 2016

HARRIS & RUBLE

23 By:           /s/ Alan Harris            
24       Alan Harris  
25       Priya Mohan

26 DATED: January 29, 2016

NORTH BAY LAW GROUP

27 By:           /s/ David S. Harris            
28       David S. Harris

Attorneys for Plaintiff  
RICARDO CASTILLO

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**ORDER**

Good cause appearing, the scheduling order is modified as follows:

- Expert Disclosures Due: July 7, 2016
- Rebuttal Expert Disclosures Due: July 21, 2016
- All Discovery Completed: August 4, 2016<sup>1</sup>
- Motion for Class Cert. (filed): September 2, 2016
- Other Motions (filed): October 13, 2016
- Pretrial Conference: **December 19, 2016 at 1:30 p.m.**
- Jury Trial: **February 22, 2017 at 9:00 a.m.**

**IT IS SO ORDERED:**

Dated: January 29, 2016

  
\_\_\_\_\_  
WILLIAM B. SHUBB  
UNITED STATES DISTRICT JUDGE

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