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EXEMPT FROM FILING FEES  
 PURSUANT TO GOVERNMENT  
 CODE SECTION 6103

5 Attorneys for Defendant, SOUTHERN CALIFORNIA  
 6 INTERGOVERNMENTAL TRAINING AND  
 DEVELOPOMENT CENTER

7  
 8 UNITES STATES DISTRICT COURT  
 9 EASTERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA  
 and THE STATE OF CALIFORNIA  
 11 *ex ret.* TAMARA EVANS,  
 12 Plaintiff/Relator,  
 13 v.  
 14 SOUTHERN CALIFORNIA  
 INTERGOVERNMENTAL  
 15 TRAINING AND DEVELOPMENT  
 CENTER, and DOES 1-10,  
 16 Defendant(s).

Case No.: 2:15-cv-00619-MCE-CKD  
**STIPULATION TO CONTINUE THE  
 DISCOVERY DEADLINE; ORDER  
 THEREON**  
 Judge: Hon. Morrison C. England, Jr.

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 18 TO THE CLERK OF THE UNITED STATES DISTRICT COURT FOR  
 19 THE EASTERN DISTRICT OF CALIFORNIA, AND TO ALL PARTIES  
 20 THROUGH THERE COUNSEL OF RECORD HEREIN:

21 Plaintiff-realtor Tamara Evans (“relator”) and defendant Southern California  
 22 Governmental Training and Development Center (“defendant”), by an through  
 23 their counsel of record, hereby recite and stipulate, subject to the Court’s approval  
 24 as provided for herein, as follows:

25 On March 19, 2015, plaintiff-relator Tamara Evans (“relator”) filed the  
 26 instant case under seal. (ECF No. 1). Following the decision of the United States  
 27 not to intervene, the court ordered the case unsealed on January 6, 2017. (ECF

1 Nos. 22-23.) Relator served defendant on January 10, 2017 with the summons and  
2 complaint as well as a copy of this court's January 6, 2017 initial pretrial  
3 scheduling order requiring discovery be completed by March 18, 2016. (ECF No.  
4 26.) Because defendant was not served until after the discovery cut-off, the parties  
5 stipulated to amending the initial pretrial scheduling order to require all discovery,  
6 except expert discovery, be completed on January 6, 2018. (ECF No. 26.)

7 In response to relator's complaint, defendant filed a motion to dismiss the  
8 relator's claims under the California False Claims Act and the court issued its order  
9 granting the motion on April 26, 2017. (ECF No. 35.) While the Court was  
10 considering the motion to dismiss, the parties delayed discovery in an effort to  
11 limit costs and litigate the action efficiently. The parties now require additional  
12 time to complete discovery, including three depositions.

13 The parties submit that good cause exists for a continuance of the fact  
14 discovery deadline and have agreed to continue the fact discovery deadline to April  
15 6, 2018 in order to allow the parties to complete fact discovery and attempt to  
16 resolve this action informally.

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1 IT IS HEREBY STIPULATED by and between relator and defendant, by  
2 and through their attorneys of record, that the initial pretrial scheduling order be  
3 amended to require that all discovery, with the exception of expert discovery, shall  
4 be completed no later than April 6, 2018.

5 IT IS SO STIPULATED.

6 Dated: January 10, 2018 MCDUGAL LOVE ECKIS  
7 BOEHMER & FOLEY

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9 By: /s/ Amanda R. Abeln-Over  
10 Steven E. Boehmer  
11 Amanda R. Abeln-Overs  
12 Attorneys for Defendant, SOUTHERN  
13 CALIFORNIA INTERGOVERNMENTAL  
TRAINING AND DEVELOPMENT  
CENTER

14 Dated: January 10, 2018 THE JAFFE LAW FIRM

15  
16 By: /s/ Stephen R. Jaffe (as authorized on  
17 January 8, 2018)  
18 Stephen R. Jaffe  
19 Attorney for Plaintiff/Relator  
TAMARA EVANS

20 **ORDER**

21 Pursuant to the terms of the foregoing stipulation, the Court extends the fact  
22 discovery deadline to April 6, 2018. All other related deadlines in the Initial  
23 Pretrial Scheduling Order will be based on this extended date.

24 IT IS SO ORDERED.

25 Dated: January 10, 2018

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27 MORRISON C. ENGLAND, JR.  
28 UNITED STATES DISTRICT JUDGE