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18 **IN THE UNITED STATES DISTRICT COURT**
19 **FOR THE EASTERN DISTRICT OF CALIFORNIA**
20 **SACRAMENTO DIVISION**

21 JAMIE IRELAND, an individual,)
22 Plaintiff,) Case No. 2:15-cv-00670-JAM-EFB
23 v.) **STIPULATION AND ORDER MODIFYING**
24 LINDER PSYCHIATRIC GROUP, INC., a) **PRE-TRIAL SCHEDULING ORDER**
25 California Corporation; DAVID LINDER,)
26 M.D., an individual; RENAE LINDER, an)
27 individual; and DOES 1 to 15,) Action Filed: December 31, 2014
28 Defendants.) First Amended Complaint: January 20,
2015
Action Removed: March 25, 2015

1 Plaintiff JAMIE IRELAND ("Plaintiff") and Defendants LINDER PSYCHIATRIC GROUP,
2 INC., DAVID LINDER, M.D., and RENAE LINDER (collectively, "Defendants"), by and
3 through their counsel of record, hereby submit the following stipulation and [proposed]
4 Order to modify the Pre-Trial Scheduling Order (Dckt. # 13) to continue the trial, and all
5 related deadlines and currently scheduled dates, as follows:

6 WHEREAS the Parties have agreed to and scheduled mediation, to take place on
7 December 11, 2015;

8 WHEREAS the Parties have engaged in written discovery and have essential
9 depositions that have not yet been scheduled;

10 WHEREAS the expert witness disclosures deadline is December 4, 2015;

11 WHEREAS the Parties agree that the time and expense associated with completing
12 depositions and preparing expert witness disclosures will impede the ability to mediate
13 and resolve this case;

14 WHEREAS the Parties intend to conduct further discovery if mediation is not
15 successful;

16 WHEREAS the Parties and their counsel agree that an Order modifying the Pre-
17 Trial Scheduling Order will not prejudice the Parties and can be issued forthwith;

18 WHEREAS the Parties and their counsel agree that this Stipulation is made in good
19 faith and not for any improper purpose;

20 WHEREAS there have been no previous modifications of the Pre-Trial Scheduling
21 Order in this matter;

22 WHEREAS good cause exists to modify the scheduling order, to allow the Parties to
23 meaningfully engage in further settlement discussions, private mediation, and to conduct
24 further discovery if the Parties do not reach a settlement.

25 NOW THEREFORE, IT IS HEREBY STIPULATED by and between the Parties, that:

26 1. All dates in the Scheduling Order will be continued, subject to Court
27 approval, to allow the Parties to meaningfully engage in further settlement discussions,
28 private mediation, and to conduct further discovery if the Parties do not reach a

1 settlement. The Parties propose ///
2 the following new scheduling deadlines and dates, which are mutually agreeable to the
3 Parties, or dates thereafter:

4	Expert Witness Disclosures:	April 15, 2016
5	Supplemental Expert Witness Disclosures:	April 29, 2016
6	Discovery Cut-Off:	June 17, 2016
7	Dispositive Motion Filing Deadline:	July 26, 2016
8	Dispositive Motion Hearing Deadline:	August 23, 2016 at 1:30 p.m.
9	Final Pretrial Conference:	October 7, 2016 at 11:00 a.m.
10	Jury Trial:	November 28, 2016 at 9:00 a.m.

11 2. The Parties agree to accept these proposed dates, or such later dates as the
12 Court may reasonably set in its discretion, subject to any subsequent adjustment
13 necessary for good cause shown.

14 3. Based on the foregoing, the Parties respectfully request this Court enter an
15 Order consistent with this Stipulation.

16 IT IS SO STIPULATED.

17 Dated: November 17, 2015

Erick C. Turner, Attorney At Law

/s/ Erick C. Turner

18 By: _____

19 Erick C. Turner
20 Attorney for Plaintiff
21 JOELLE STALLSMITH

22 Dated: November 17, 2015

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LAW CORPORATION

/s/ Alder J. Parker

23 By: _____

24 Alden J. Parker
25 Attorneys for Defendant
26 LINDER PSYCHIATRIC GROUP, INC.

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ORDER (AS AMENDED BY THE COURT)

Based upon the Stipulation of the parties and good cause appearing therefore, IT IS SO ORDERED.

Dated: 11/18/2015

/s/ John A. Mendez
UNITED STATES DISTRICT COURT JUDGE