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 GREENFIELD CARE CENTER OF FAIRFIELD
 AND EVA CARE GROUP, LLC

UNITED STATES DISTRICT COURT
 EASTERN DISTRICT OF CALIFORNIA

FABIENNE OUAPAOU-LENA,
 Plaintiff,

v.

GREENFIELD CARE CENTER OF
 FAIRFIELD, EVA CARE GROUP, LLC,
 DOES 1 - 50 INCLUSIVE,
 Defendants.

Case No. 2:15-cv-00721-JAM-DB

**STIPULATION TO EXTEND DEADLINE
 FOR FILING DISPOSITIVE MOTIONS,
 TRIAL DATE AND RELATED
 DEADLINES**

Discovery Cutoff:	October 31, 2016
Trial Date:	February 27, 2016
Motion Deadline:	November 16, 2016
Magistrate Judge:	Deborah Barnes

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2 Plaintiff FABIENNE OUAPAOU-LENA ("Plaintiff") and Defendants
3 GREENFIELD CARE CENTER OF FAIRFIELD and EVA CARE GROUP, LLC ("Defendants"),
4 by and through their respective counsel of record, hereby stipulate as follows:

5 The pre-trial scheduling order in this matter sets a deadline of November 16, 2016,
6 for the parties to file dispositive motions, with a hearing date of December 14, 2016, and a trial date
7 of February 27, 2017. The parties seek to amend these dates and all related deadlines for good cause.

8 The parties have been diligently working to secure a mutually acceptable date and
9 location for the deposition of Plaintiff's supervisor John Padama. Despite those efforts, and owing to
10 the burdens of counsels' calendars, the deponent's calendar, and the Thanksgiving holiday, the
11 parties were unable to determine any date prior to November 28, 2016, that was available to the
12 parties, counsel and Mr. Padama. Mr. Padama is set to be deposed on November 28, 2016, in Los
13 Angeles. In order to ensure that all necessary evidence is available for inclusion in a dispositive
14 motion, and to ensure Plaintiff's counsel has sufficient time to defend such a motion, the parties
15 require an extension of the deadline to file dispositive motions.

16 Additionally, the parties have been engaged in settlement discussions and wish to
17 continue those efforts after Mr. Padama's testimony has been secured and before a motion for
18 summary judgment is pending. Extension of the dispositive motion deadline will provide the parties
19 an opportunity to do so. A continuance of the dispositive motion hearing date, trial date and all
20 related deadlines would accommodate a continued deadline for filing dispositive motions.

21 Accordingly, the parties respectfully request: a dispositive motion filing deadline of
22 no earlier than December 13, 2016; a dispositive motion hearing date of no earlier than January 20,
23 2017; a joint pretrial statement filing deadline of no earlier than February 17, 2017; a final pretrial
24 conference date of no earlier than February 24, 2017; and a trial date of no earlier than April 3, 2017.

25 The parties do not anticipate any additional continuance of this matter.

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2 NOW, THEREFORE, IT IS HEREBY STIPULATED, by and between the parties
3 through their respective counsel, that the deadlines, hearing dates and conference dates currently set
4 in this matter be continued as follows: a dispositive motion filing deadline of no earlier than
5 December 13, 2016; a dispositive motion hearing date of no earlier than January 20, 2017 at 1:30
6 p.m.; a joint pretrial statement filing deadline of no earlier than February 17, 2017; a final pretrial
7 conference date of no earlier than February 24, 2017 at 10:00 a.m; and a trial date of no earlier than
8 April 3, 2017 at 9:00 a.m.

9
10 Dated: November 9, 2016

LITTLER MENDELSON, PC

11
12 /s/ John H. Adams, Jr.

13 LINDBERGH PORTER
14 BARBARA A. BLACKBURN
15 JOHN H. ADAMS, JR.
16 Attorneys for Defendants

17 Dated: November 9, 2016

18 SAMUEL RUDOLPH AND ASSOCIATES

19 /s/ Samuel Rudolph (as authorized on
20 11/09/16)

21 SAMUEL RUDOLPH
22 Attorneys for Plaintiff

23 IT IS SO ORDERED.

24 Dated: 11/9/2016

/s/ John A. Mendez

25 UNITED STATES DISTRICT COURT JUDGE