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6 NATIONAL RAILROAD PASSENGER
CORPORATION, dba AMTRAK

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8 **UNITED STATES DISTRICT COURT**
9 **EASTERN DISTRICT OF CALIFORNIA - SACRAMENTO**

10 LINDA KESSLER,

11 Plaintiff,

12 v.

13 NATIONAL RAILROAD PASSENGER
14 CORPORATION, doing business as AMTRAK,
and DOES 1 through 10, inclusive,

15 Defendants.

Case No. 2:15-CV-00728-GEB-AC

**STIPULATION OF THE PARTIES TO
MODIFY THE SCHEDULING ORDER
AND EXTEND DISCOVERY
DEADLINES;
[PROPOSED] ORDER**

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18 **STIPULATION OF THE PARTIES TO MODIFY THE SCHEDULING ORDER AND**
19 **EXTEND DISCOVERY DEADLINES**

20 Pursuant to Rules 16(b)(4) and 29 of the Federal Rules of Civil Procedure, Defendant
21 NATIONAL RAILROAD PASSENGER CORPORATION dba AMTRAK (“Defendant” or
22 “AMTRAK”) and Plaintiff LINDA KESSLER (“Plaintiff” or “KESSLER”), by and through their
23 attorneys of record, hereby stipulate to modify the scheduling order filed July 14, 2015, to
24 extend the time for discovery deadlines previously set in this matter.

25 The initial expert witness disclosure deadline is currently scheduled for November 24,
26 2015. The parties request a two month extension of this deadline to January 25, 2016.

27 The rebuttal expert witness disclosure deadline is currently scheduled for January 22,
28 2016. The parties request a two month extension of this deadline to March 22, 2016.

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Discovery is currently scheduled to be completed by March 22, 2016. The parties request a one month extension of this deadline to April 22, 2016.

All other dates will remain the same as provided for in the July 14, 2015 scheduling order.

GOOD CAUSE EXISTS FOR THE REQUESTED MODIFICATIONS AND EXTENSIONS

Defendant's lead trial counsel, Stephanie Quinn, is currently on unexpected leave due to the very recent adoption of an infant. As such, Ms. Quinn will be unable to take Plaintiff's deposition previously scheduled to take place on October 20, 2015.

Moreover, despite the parties' diligent efforts to schedule the depositions of Plaintiff's medical treaters prior to the expert witness disclosure deadline, the parties will be unable to timely complete these depositions due to Ms. Quinn's unexpected leave.

For these reasons, counsel for the parties have stipulated to modify the scheduling order and extend discovery deadlines.

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1 All other dates will remain the same as provided for in the July 14, 2015 scheduling
2 order.

3 **IT IS HEREBY STIPULATED**

4 DATED: October 14, 2015

MURPHY, CAMPBELL, ALLISTON & QUINN

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6 By: /s/ RAYMOND TUASON
STEPHANIE L. QUINN (SBN 216655)
7 RAYMOND TUASON (SBN 279346)
Attorneys for Defendant
8 NATIONAL RAILROAD PASSENGER
CORPORATION, dba AMTRAK
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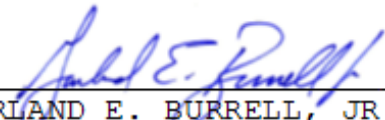
10 DATED: October 14, 2015

GANONG LAW

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12 By: /s/ PHILIP W. GANONG
13 PHILIP W. GANONG (SBN 88414)
Attorneys for Plaintiff LINDA KESSLER
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15 **IT IS SO ORDERED:**

16 **Dated: October 14, 2015**

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GARIAND E. BURRELL, JR.
20 Senior United States District Judge
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