1 2 3 4 5 6 7 8 9 10 11 12 13	Kelsey A. Israel-Trummel kitrummel@jonesday.com JONES DAY 555 California Street, 26th Floor San Francisco, CA 94104 Telephone: +1.415.626.3939 Facsimile: +1.415.875.5700 Donald J. Munro (admitted <i>pro hac vice</i>) dmunro@jonesday.com JONES DAY 51 Louisiana Avenue, NW Washington, DC 20001 Telephone: +1.202.879.3922 Facsimile: +1.202.626.1700 Attorneys for Plaintiffs NATIONAL RAILROAD PASSENGER CORPORATION, BNSF RAILWAY COMPAN UNION PACIFIC RAILROAD COMPANY, LC ANGELES JUNCTION RAILWAY, TTX COMPANY, AND CENTRAL CALIFORNIA TRACTION COMPANY	
13	UNITED STATES DISTRICT COURT	
15	EASTERN DISTRICT OF CALIFORNIA	
15		TO DIVISION
17	NATIONAL RAILROAD PASSENGER CORPORATION (D/B/A AMTRAK), BNSF	Case No. 2:15-cv-00924-KJM-EFB
18	RAILWAY COMPANY, UNION PACIFIC RAILROAD COMPANY, LOS ANGELES	JOINT STIPULATION AND ORDER FOR EXTENSION OF DISCOVERY
19 20	JUNCTION RAILWAY, TTX COMPANY, and CENTRAL CALIFORNIA TRACTION COMPANY,	DEADLINE
21	Plaintiffs,	
22	V.	
23	JULIE SU, in her official capacity as Labor	
24	Commissioner, State of California Division of Labor Standards Enforcement,	
25	Defendant.	
25 26		
20 27		
28		JOINT STIPULATION AND ORDER FOR EXTENSION OF DISCOVERY DEADLINE Case No. 2:15-cv-00924-KJM-EFB

1	Pursuant to Local Rule 143, Plaintiffs National Railroad Passenger Corporation (d/b/a
2	Amtrak), BNSF Railway Company, Union Pacific Railroad Company, Los Angeles Junction
3	Railway, TTX Company, and Central California Traction Company, Defendant Julie Su, and the
4	Union-Intervenors ¹ hereby submit this joint stipulation and proposed order for an extension of the
5	discovery deadline. Per the Court's Status (Pretrial Scheduling) Order (Phase Two), Dkt. No. 78,
6	discovery concerning Phase Two of this litigation is scheduled to close on March 16, 2018. The
7 8	parties jointly request an extension of that deadline until March 30, 2018. The parties have not
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9 10	previously sought any extensions of discovery in Phase Two of this litigation. The parties do not
10	anticipate that any other deadlines will be affected by this extension.
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26	¹ The Transportation Division of the International Association of Sheet Metal, Air, Rail and Transportation Workers; Mechanical Division of the International Association of Sheet Metal, Air, Rail and Transportation Workers; Brotherhood of Locomotive Engineers and Trainmen; International Brotherhood of Electrical Workers; National
27	Conference of Firemen & Oilers District of Local 32BJ, Service Employees International Union (SEIU); Brotherhood of Railroad Signalmen; and Brotherhood of Maintenance of Way Employees Division/International
28	Brotherhood of Teamsters. JOINT STIPULATION AND ORDER FOR EXTENSION OF DISCOVERY DEADLINE
	2 Case No. 2:15-cv-00924-KJM-EFB

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1	Respectfully submitted,	
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3	Dated: March 6, 2018	JONES DAY
4		By: <u>/s/ Kelsey Israel-Trummel</u> Kelsey Israel-Trummel
5		Donald J. Munro Attorneys for Plaintiffs
6		NATIONAL PASSENGER RAILROAD CORPORATION,
7		BNSF RAILWAY COMPANY, UNION PACIFIC RAILROAD COMPANY, LOS ANGELES JUNCTION
8		RAILWAY, TTX COMPANY AND CENTRAL CALIFORNIA TRACTION COMPANY
9	Dated: March 6, 2018	XAVIER BECERRA
10		Attorney General of California
11		TAMAR PACHTER Supervising Deputy Attorney General
12		Supervising Deputy Attorney General
13		By: <u>/s/ Peter Chang (as authorized on March 5, 2018)</u>
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18		Commissioner
19	Dated: March 6, 2018	UNION-INTERVENORS
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26	Dated: March 6, 2018	SMART-TD
27		By: /s/ Erika Diehl-Gibbons (as authorized March 5, 2018)
28		Erika A. Diehl-Gibbons
		JOINT STIPULATION AND ORDER FOR EXTENSION OF DISCOVERY DEADLINE
		Case No. 2:15-cv-00924-KJM-EFB

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7		INTERNATIONAL ASSOCIATION OF THE
7		AIR, RAIL AND TRANSPORTATION WORKERS
8	Dated: March 6, 2018	ZWEDDLING DALIL KAHN & WOLLY DC
9	Dated: March 6, 2018	ZWERDLING, PAUL, KAHN & WOLLY, P.C.
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15		TRAINMEN, NATIONAL CONFERENCE OF FIREMEN & OILERS DISTRICT OF LOCAL 32BJ, SEIU, and
16		INTERNATIONAL BROTHERHOOD OF ELECTRICAL
17		WORKERS
18	Dated: March 6, 2018	MOONEY, GREEN, SAINDON, MURPHY AND WELCH PC
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20		By: /s/ Richard Edelman (as authorized on March 5, 2018) Richard Edelman
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		BROTHERHOOD OF KAILKOAD SIGNALMEN, BROTHERHOOD OF MAINTENANCE OF WAY
25		EMPLOYEES DIVISION/IBT, and MECHANICAL
26		DIVISION OF THE INTERNATIONAL ASSOCIATION OF SHEET METAL, AIR, RAIL AND
27		TRANSPORTATION WORKERS
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		JOINT STIPULATION AND ORDER FOR
		EXTENSION OF DISCOVERY DEADLINE Case No. 2:15-cv-00924-KJM-EFB
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1	ORDER
2	PURSUANT TO STIPULATION, IT IS SO ORDERED that the parties have until March
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4	30, 2018 to complete discovery in Phase Two of this litigation.
5	DATED: March 8, 2018.
6	MA Mulla /
7	UNITED STATES DISTRICT JUDGE
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	JOINT STIPULATION AND ORDER FOR EXTENSION OF DISCOVERY DEADLINE Case No. 2:15-cv-00924-KJM-EFB
	Case NO. 2.15-CV-00924-KJM-EFD