

1 MCCORMACK AND ERLICH, LLP  
 2 JASON M. ERLICH (SBN 203661)  
 3 BROOKS A. HARRIS (SBN 298483)  
 4 150 Post Street, Suite 742  
 5 San Francisco, California 94108  
 6 Telephone: (415) 296-8420  
 7 Facsimile: (415) 296-8552  
 8 Email: [jason@mcelawfirm.com](mailto:jason@mcelawfirm.com)  
 9 [brooks@mcelawfirm.com](mailto:brooks@mcelawfirm.com)

10 Attorneys for Plaintiff  
 11 RHONDA CABRAL

12 JACKSON LEWIS P.C.  
 13 CARY G. PALMER (SBN 186601)  
 14 JERRY J. DESCHLER (SBN 215691)  
 15 801 K Street, Suite 2300  
 16 Sacramento, California 95814  
 17 Telephone: (916) 341-0404  
 18 Facsimile: (916) 341-0141  
 19 Email: [palmerc@jacksonlewis.com](mailto:palmerc@jacksonlewis.com)  
 20 [deschlej@jacksonlewis.com](mailto:deschlej@jacksonlewis.com)

21 Attorneys for Defendant  
 22 SAVE MART SUPERMARKETS, INC.

23 UNITED STATES DISTRICT COURT  
 24 EASTERN DISTRICT OF CALIFORNIA

25 RHONDA CABRAL,  
 26 Plaintiff,  
 27 v.  
 28 SAVE MART SUPERMARKETS, INC.; and  
 DOES 1 to 25,  
 Defendants.

CASE NO. 2:15-cv-00994-JAM-KJN

**STIPULATED REQUEST FOR  
 MODIFICATION OF STATUS (Pre-  
 Trial Scheduling) ORDER (DKT. #11)  
 AND ORDER THEREON**

Complaint Filed: 05.06.15

Plaintiff RHONDA CABRAL (“Plaintiff”) and Defendant SAVE MART  
 SUPERMARKETS, INC. (“Defendant”) respectfully request modification of the Court’s Status  
 (Pre-Trial Scheduling) Order filed July 16, 2015 (Dkt.# 11) with respect to scheduling of  
 dispositive motions.

As set forth in the parties Joint Status Report (Dkt. #10), the parties agreed that any

1 opposition to a dispositive motion would be due within 28 days after the moving papers are filed.

2 Therefore, in order to comply with the Court's dispositive hearing deadline of January 11,  
3 2017, the parties propose the following modifications to the Court's Status Order to reflect the  
4 following language: "All dispositive motions shall be filed by November 30, 2016."

5 No other change to the Status Order is requested.

6  
7 Respectfully submitted,

8 Dated: July 22, 2015

MCCORMACK AND ERLICH, LLP

9  
10 By: /s/ Jason Erlich

11 JASON M. ERLICH

12 Attorneys for Plaintiff  
RHONDA CABRAL

13 Dated: July 22, 2015

JACKSON LEWIS P.C.

14  
15 By: /s/ Jerry J. Deschler Jr.

16 [as authorized 07/22/2015]

JERRY J. DESCHLER JR.

17 Attorneys for Defendant  
18 SAVE MART SUPERMARKETS, INC.

19 **ORDER**

20 The Court has reviewed Stipulated Request for Modification of Status (Pre-Trial  
21 Scheduling) Order (Dkt. #11). Based upon a review of the record, and good cause appearing, **IT**  
22 **IS HEREBY ORDERED** as follows:

- 23 1. The Status Order (Dkt. #11) is modified as follows: "All dispositive motions shall be  
24 filed by November 30, 2016."

25 Dated: 7/23/2015

/s/ John A. Mendez

26 JOHN A. MENDEZ

27 United States District Court Judge