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10 Attorneys for Defendant  
 11 UNION PACIFIC RAILROAD COMPANY

12 IN THE UNITED STATES DISTRICT COURT  
 13 FOR THE EASTERN DISTRICT OF CALIFORNIA

14 KATIE M. STEFFEN,  
 15 Plaintiff,  
 16 vs.  
 17 UNION PACIFIC RAILROAD COMPANY, a  
 18 Delaware Corporation, BRIAN L. KLINE  
 19 and DOES 1 through 10, inclusive,  
 20 Defendants.

Case No. 2:15-CV-01025-TLN-KJN

**STIPULATION OF THE PARTIES TO  
 MODIFY THE PRETRIAL  
 SCHEDULING ORDER AND EXTEND  
 DISCOVERY DEADLINES;  
 ORDER**

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

21 Pursuant to Rules 16(b) (4) and 29 of the Federal Rules of Civil Procedure,  
 22 Defendants UNION PACIFIC RAILROAD COMPANY and BRIAN L. KLINE and  
 23 Plaintiff KATIE M. STEFFEN, by and through their attorneys of record, subject to  
 24 the approval of the Court and good cause present, hereby stipulate to modify the  
 25 Pretrial Scheduling Order dated July 22, 2015, and extend the time for discovery  
 26 deadlines previously set in this matter.

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1 The parties submit that there is good cause for the proposed modification of  
2 this Court's Pretrial Scheduling order for the following reasons: While this lawsuit  
3 revolves around a relatively simple set of facts – a two car collision on I-80 on  
4 September 3, 2015 – based upon a review of medical records subpoenaed to date,  
5 plaintiff is not currently medically stable and continues to treat with a variety of  
6 medical practitioners for myriad injuries, resulting primarily from a head injury  
7 (skull fracture). The parties understand that the basic diagnosis is traumatic brain  
8 injury, resulting in cognitive disabilities, including memory loss. While the  
9 defendants have been diligent in collecting medical records, depositions of the  
10 plaintiff and her treaters at this point are premature. Defendants have postponed  
11 the depositions for a time when when plaintiff has medically plateaued. While the  
12 parties' understanding is that the prognosis is guarded, both sides agree that  
13 additional time is warranted to make the depositions meaningful. Both sides desire  
14 to avoid duplicative depositions of treaters, as well as the plaintiff.

15 THEREFORE, THE PARTIES STIPULATE AND AGREE AND RESPECTFULLY  
16 REQUEST the following modifications to the scheduling order:

17 The date for completion of discovery, with the exception of expert discovery, is  
18 currently scheduled for June 30, 2016. The parties request an extension of this  
19 deadline to September 30, 2016.

20 The expert disclosure deadline is currently scheduled for August 25, 2016.  
21 The parties request an extension of this deadline to November 28, 2016.

22 The exchange of lists of rebuttal expert witnesses is currently scheduled for  
23 20 days after August 26, 2016 – or September 14, 2016. The parties request an  
24 extension of this deadline to 20 days following the proposed new deadline of  
25 November 28, 2016 for expert disclosure- or December 15, 2016.

26 Counsel was instructed to complete all discovery of expert witnesses in a  
27 timely manner in order to comply with the Court's deadline for filing dispositive  
28 motions. As a dispositive motion is not appropriate in this case, the parties request

1 an extension of the expert witness discovery completion date for 75 days after the  
2 rebuttal disclosure – or February 28, 2017.

3 All other dates will remain the same as provided for in the July 22, 2015  
4 Pretrial Scheduling Order.

5 **IT IS HEREBY STIPULATED.**

6  
7 Dated: 3/17/16

DREYER BABICH BUCCOLA WOOD &  
CAMPORA, LLP

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9  
10 By: /s/

ROBERT BUCCOLA  
State Bar No.112880  
Attorneys for Plaintiff KATIE STEFFEN

11  
12 Dated: 3/18/16

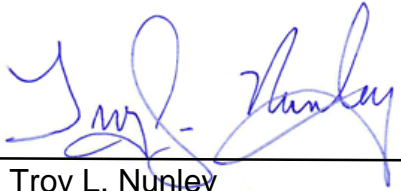
UNION PACIFIC RAILROAD COMPANY

13  
14  
15 By: /s/

JOHN D. FEENEY  
State Bar No. 84373  
Attorney for Defendant  
UNION PACIFIC RAILROAD COMPANY

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18 **IT IS SO ORDERED:**

19  
20 Dated: March 23, 2016

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Troy L. Nunley  
United States District Judge