

1 Katarzyna W. Nowak [SBN 256977]
 FISHER & PHILLIPS LLP
 2 One Embarcadero Center, Suite 2050
 San Francisco, California 94111-3712
 3 Tel: (415) 490-9000
 Fax: (415) 490-9001
 4 Email: knowak@fisherphillips.com

5 Craig Annunziata (*Admitted Pro Hac Vice*)
 Jason D Keck (*Admitted Pro Hac Vice*)
 6 FISHER & PHILLIPS, LLP
 10 S. Wacker Dr., Suite 3450
 7 Chicago, IL 60606
 8 Tel: (312)-346-8061
 Fax: (312)-346-3179
 9 Email: cannunziata@fisherphillips.com
jkeck@fisherphillips.com

10 Attorneys for Defendants
 11 LKQ FOSTER AUTO PARTS, INC.
 12 LKQ CORPORATION, INC.

13 **UNITED STATES DISTRICT COURT**
 14 **EASTERN DISTRICT OF CALIFORNIA**
 15 **SACRAMENTO DIVISION**

16 SHLANDA JOHNSON)
 17 Plaintiff,)
 18 vs.)
 19 LKQ FOSTER AUTO PARTS, INC., and)
 20 DOES 1-50, inclusive.)
 21 Defendants.)
 22)
 23)

Case No.: 2:15-cv-02413-KJM-AC

**JOINT STIPULATION AND ORDER
 FOR TWO WEEK CONTINUANCE OF
 SUMMARY JUDGMENT DEADLINE**

Complaint Filed: November 19, 2015
 Trial Date: May 7, 2018

1 IT IS HEREBY STIPULATED by and between Plaintiff SHLANDA JOHNSON
2 (“Plaintiff”) and Defendant LKQ FOSTER AUTO PARTS, INC. (“Defendant”) that GOOD
3 CAUSE exists for a two-week extension of time, until November 3, 2017, for Defendant and
4 Plaintiff to e-file any dispositive motion and supporting papers pursuant to Federal Rule of
5 Civil Procedure 56. The Parties are discussing the possibility of settlement and, therefore,
6 believe that continuing the dispositive motion deadline by two weeks will facilitate the Parties’
7 settlement discussion and permit the Parties to devote their respective efforts towards
8 settlement.

9 Moreover, because the Parties are hereby stipulating to a two-week extension of time,
10 until November 3, 2017, for Defendant and Plaintiff to file and serve any dispositive motion
11 and supporting papers, the Parties further stipulate that responding party’s deadline to respond
12 to any dispositive motion shall likewise be extended, to November 17, 2017, and the moving
13 party’s deadline to reply, if any, shall be extended until November 27, 2017 (extended because
14 of Thanksgiving Holiday on November 23, 2017).

15
16 **IT IS SO STIPULATED.**

17
18 Dated: October 16, 2017

By: /s/ Jason D Keck
FISHER & PHILLIPS, LLP
Jason D Keck
Counsel for Defendant
LKQ FOSTER AUTO PARTS, INC

19
20
21
22 Dated: October 16, 2017

By: /s/ Barbara E. Figari
THE FIGARI LAW FIRM
Barbara E. Figari
Counsel for Plaintiff
SHLANDA JOHNSON

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

ORDER

GOOD CAUSE appearing, the Court ORDERS as follows:

IT IS HEREBY ORDERED that:

- 1) The Parties' Stipulation for a two-week extension of time to file dispositive motions is approved.
- 2) Any dispositive motion shall be filed on or before November 3, 2017.
- 3) Any response(s) to any dispositive motion shall be filed on or before November 17, 2017.
- 4) Any reply(ies) to any dispositive motion shall be filed on or before November 27, 2017.
- 5) Absent further Order, all previously set dates shall stand.

IT IS SO ORDERED.

DATED: October 18, 2017.


UNITED STATES DISTRICT JUDGE