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5	Attorneys for Plaintiff in Intervention USA WASTE OF CALIFORNIA INC.	
6	UNITED STATES DISTRICT COURT	
7	EASTERN DISTRICT OF CALIFORNIA	
8		
9	KENNETH MEDLEY,	Case No. 2:15-cv-02453-TLN-CKD
10	Plaintiff,	STIPULATION AND ORDER TO EXTEND
11	v.	FACT DISCOVERY DEADLINE FOR THE PURPOSE OF DEPOSING WITNESSES
12	McNEILUS TRUCK AND MANUFACTURING INC., and DOES 1 through 100,	AND TO EXTEND THE EXPERT DISCLOSURE AND EXPERT
13		DISCOVERY CUT OFF DATES
14	Defendants.	The Honorable Troy L. Nunley Trial Date: August 7, 2017
15		That Date. August 1, 2011
16	USA WASTE OF CALIFORNIA INC.,	
17	Intervenor	
18		
19	V.	
20	McNEILUS TRUCK AND MANUFACTURING INC., and DOES 1	
21	through 100, inclusive,	
22	Defendants	
23		
24	Subject to the approval of this Court, the parties hereby stipulate to extend the deadline for	
25	completion of fact discovery from October 15, 2016 to December 15, 2016. The parties also	
26	stipulate that the deadline to disclosure expert witnesses be extended to January 16, 2017 with	
27	expert discovery cutting off on March 16, 2017. The parties make this request because extra	
28		
	-1- STIPULATION AND ORDER TO EXTEND FACT DISCOVERY DEADLINE FOR THE PURPOSE OF DEPOSING WITNESSES	

1	time is necessary to complete fact discovery, which all sides have pursued diligently. Further,		
2	Waste Management only recently became a a party to this action on September 26, 2016 and as		
3	such has, had insufficient time to conduct written discovery in any form. In addition, additional		
4	depositions are required which may also lead to the need for further depositions, based on facts		
5	discovered in the initial depositions. Premised upon these facts, as well as the fact there is more		
6	than sufficient time prior to the assigned trial date in this matter, the parties request that the fact		
7			
8	discovery deadline be extended to December 15, 2016; the expert disclosure deadline be extended		
9	to January 16, 2017; and the expert discovery cut off be extended to March 16, 2017.		
10	The requested extension will not affect any of the other dates set in this case. The parties		
11	have conferred and jointly agree to this extension.		
12	SO STIPULATED.		
13 14	Dated: 11/1/16	LENAHAN, LEE, SLATER & PEARSE, LLP	
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16		/s/	
17		ADAM M. AMBROZY Attorney for Intervenor	
18	G O G G T T T T T T T T T T T T T T T T	Attorney for intervenor	
19	SO STIPULATED.		
20	Dated: 11/1/16	/s/ SPENCER J. PAHLKE	
21		Attorney for Plaintiffs	
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23	SO STIPULATED.		
24	Dated: 11/1/16	/s/ ELIZABETH V. MCNULTY	
25		Attorney for Defendant	
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L	II		

## PURSANT TO STIPULATION, IT IS SO ORDERED. Dated: November 7, 2016

Troy L. Nunley

United States District Judge