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6 Attorneys for Defendants Hilton Worldwide Holdings, Inc.; Hilton  
 7 Worldwide, Inc.

8 UNITED STATES DISTRICT COURT  
 9 EASTERN DISTRICT OF CALIFORNIA

11 FADI HADDAD,

12 Plaintiff,

13 v.

14 HILTON WORLDWIDE HOLDINGS, INC.;  
 15 HILTON WORLDWIDE, INC.; and DOES 1-50  
 Inclusive,

16 Defendants.  
 17

Case No. 2:16-CV-00405-MCE-CKD

**STIPULATION TO EXTEND DISCOVERY  
 CUTOFF DATE; PROPOSED ORDER**

18 The parties are informed and believed that the current discovery cutoff date is February 23, 2017.  
 19 However, both parties agree for good cause to be shown that this deadline will not allow them to  
 20 complete all necessary discovery and have stipulated to moving the deadline to August 23, 2017. All  
 21 other deadlines, including expert discovery, shall follow the Initial Pretrial Scheduling Order from the  
 22 Court. No prior requests to extend this discovery deadline have been made and this matter has yet to be  
 23 set for trial.  
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25 This case involves a personal injury that is alleged to have occurred at the Hilton Abu Dhabi in  
 26 the United Arab Emirates. Defendants contend that due to the various locations of key evidence and key  
 27 witnesses, discovery and investigation is taking longer than anticipated. Corporate defendants, although  
 28

1 located in the United States, must coordinate and communicate with another entity in Abu Dhabi to  
2 investigate the claims as well as respond to plaintiff's discovery along with other entities related to the  
3 Hilton Abu Dhabi which are likewise located abroad. Furthermore, plaintiff initially obtained healthcare  
4 for the subject injury in the United Arab Emirates and in Lebanon and to obtain those records will  
5 require coordination with outside counsel to assist in obtaining those records. Subpoenas may need to be  
6 served pursuant to the provisions of the Hague Convention. The process is expected to take several  
7 months. Finally, a key eye witness, the masseuse who is alleged to have injured plaintiff, has not been  
8 located by defendants. The masseuse is no longer employed by Hilton Abu Dhabi and is believed to be  
9 living in Qatar. It is anticipated by defendants that she is likely to be a key witness for defense purposes.

11 The parties are cooperating with regard to taking foreign and/or out of state depositions. The  
12 parties have agreed to make all party witnesses and third party witnesses (within their control) available  
13 for depositions via videoconference and/or teleconference without foreign or out of state deposition  
14 commissions, to the extent possible, to save the time and expense of foreign travel.

16 The parties also wish to engage in meaningful mediation prior to the beginning of expert  
17 discovery. The parties are not prepared to mediate this matter based on the current discovery deadline.

19 DATED: February , 2017

BORTON PETRINI, LLP

21 By           /s/ Stephen C. Ruehmann            
22 Stephen C. Ruehmann, Attorneys for  
23 Defendants Hilton Worldwide Holdings, Inc.;  
Hilton Worldwide, Inc.

24 DATED: February , 2017

ENGSTROM, LIPSCOMB & LACK

26 By           /s/ Steven J. Lipscomb            
27 Steven J. Lipscomb, Attorneys for  
28 Plaintiff Fadi Haddad

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Good cause appearing, discovery shall be conducted so as to be completed by August 23, 2017.

**IT IS SO ORDERED.**

Dated: February 27, 2017

  
MORRISON C. ENGLAND, JR  
UNITED STATES DISTRICT JUDGE