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ATTORNEYS FOR PLAINTIFF

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

ELENA TYURINA,

Plaintiffs,

v.

URBANA TAHOE TC LLC; URBANA
TAHOE BEVERAGE COMPANY, LLC dba
Beach Retreat and Lodge Tahoe; ACTION
MOTORSPORTS OF TAHOE, INC.,

Defendants.

No. 2:16-cv-00759-TLN-DB

**STIPULATION AND ORDER TO PERMIT
ADDITIONAL DEPOSITIONS**

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Whereas factual discovery in the present litigation is proceeding with all parties proceeding in good faith, subject to the approval of this Court and pursuant to Fed. Rule of Civ. Proc., Rule 30(a)(2)(A)(i), the parties hereby stipulate to permit additional depositions per party as follows:

A. Plaintiff Elena Tyurina: Twenty (20) total depositions;

B. Urbana Tahoe TC LLC and Urbana Tahoe Beverage Company, LLC dba Beach Retreat and Lodge Tahoe: Ten (10) total depositions;

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C. Action Motorsports of Tahoe, Inc.: Ten (10) total depositions.

This stipulation is not intended to limit or restrict future stipulations between the parties to further enlarge the total number of permissible depositions if the same is required by the development of information regarding witnesses and evidence developed in ongoing discovery, or to limit or restrict any party from individually requesting leave of Court to seek leave to notice depositions of fact witnesses in excess of the number set forth herein.

SO STIPULATED.

Dated: August 15, 2017

WALKUP, MELODIA, KELLY & SCHOENBERGER

/s/ Valerie Rose
MICHAEL A. KELLY
VALERIE N. ROSE
Attorneys for Plaintiff ELENA TYURINA

Dated: August 14, 2017

PAGLIERO & ASSOCIATES

/s/ James Pagliero
JAMES R. PAGLIERO
Attorneys for Defendant MOTORSports OF
TAHOE, INC.

Dated: August ____, 2017

RUSHFORD & BONOTTO, LLP

JAMES W. RUSHFORD
Attorneys for Defendant URBANA TAHOE TC, LLC;
URBANA TAHOE BEVERAGE COMPANY, LLC
and ACTION MOTORSports OF TAHOE, INC.

1 Dated: August 14, 2017

RUSHFORD & BONOTTO, LLP

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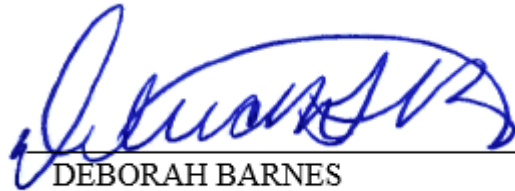
/s/ James Rushford
JAMES W. RUSHFORD
Attorneys for Defendant URBANA TAHOE TC, LLC;
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and ACTION MOTORSPORTS OF TAHOE, INC.

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ORDER

Pursuant to the parties' stipulation, IT IS SO ORDERED.

Dated: August 18, 2017



DEBORAH BARNES
UNITED STATES MAGISTRATE JUDGE

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