1 2 3 4 5 6	JAMES R. KIRBY II [SBN: 88911] NAGELEY, KIRBY & WINBERRY, LLP 8801 Folsom Boulevard, Suite 172 Sacramento, CA 95826 Telephone No.: (916) 386-8282 Facsimile No.: (916) 386-8952 Attorneys for Plaintiff DOROTHY RODDEN JACKSON	
7 8		
9	UNITED STATES DISTRICT COURT EASTERN DISTRICT OF CALIFORNIA	
10	EASTERN DISTRICT OF CALIFORNIA	
11	DOROTHY RODDEN JACKSON,	Case No.: 2:16-cv-00891-TLN-KJN
12	Plaintiff,	STIPULATION AND ORDER RESOLVING MOTION TO COMPEL
13	VS.	AND FOR SANCTIONS (ECF NO. 151)
14	RICHARD CALONE; CALONE & HARRE LAW GROUP, LLP; CALONE & BEATTII LLP; CALONE LAW GROUP, LLP,	
15	Defendant.	TRIAL DATE:
16	Defendant.	
16 17		depositions to accommodate Defendants' counsel's
	Plaintiff has rescheduled Defendants'	
17	Plaintiff has rescheduled Defendants' trial schedule. To avoid potential prejudice to	depositions to accommodate Defendants' counsel's
17 18	Plaintiff has rescheduled Defendants' trial schedule. To avoid potential prejudice to issue arising from the re-scheduled deposition	depositions to accommodate Defendants' counsel's Plaintiff, the parties stipulate that any discovery
17 18 19	Plaintiff has rescheduled Defendants' trial schedule. To avoid potential prejudice to issue arising from the re-scheduled deposition the twenty-one days' notice provided by local	depositions to accommodate Defendants' counsel's Plaintiff, the parties stipulate that any discovery as may be heard on fourteen days' notice, rather than
17 18 19 20	Plaintiff has rescheduled Defendants' trial schedule. To avoid potential prejudice to issue arising from the re-scheduled deposition the twenty-one days' notice provided by local	depositions to accommodate Defendants' counsel's o Plaintiff, the parties stipulate that any discovery as may be heard on fourteen days' notice, rather than a rule, with joint statements due seven days before the n by the Court, Plaintiff will withdraw her pending
17 18 19 20 21	Plaintiff has rescheduled Defendants' trial schedule. To avoid potential prejudice to issue arising from the re-scheduled deposition the twenty-one days' notice provided by local hearing date. Upon approval of this stipulatio	depositions to accommodate Defendants' counsel's o Plaintiff, the parties stipulate that any discovery as may be heard on fourteen days' notice, rather than a rule, with joint statements due seven days before the n by the Court, Plaintiff will withdraw her pending
 17 18 19 20 21 22 	Plaintiff has rescheduled Defendants' trial schedule. To avoid potential prejudice to issue arising from the re-scheduled deposition the twenty-one days' notice provided by local hearing date. Upon approval of this stipulatio motion to compel and for sanctions (ECF No. So stipulated.	depositions to accommodate Defendants' counsel's o Plaintiff, the parties stipulate that any discovery as may be heard on fourteen days' notice, rather than a rule, with joint statements due seven days before the n by the Court, Plaintiff will withdraw her pending
 17 18 19 20 21 22 23 	Plaintiff has rescheduled Defendants' trial schedule. To avoid potential prejudice to issue arising from the re-scheduled deposition the twenty-one days' notice provided by local hearing date. Upon approval of this stipulatio motion to compel and for sanctions (ECF No. So stipulated.	depositions to accommodate Defendants' counsel's o Plaintiff, the parties stipulate that any discovery as may be heard on fourteen days' notice, rather than a rule, with joint statements due seven days before the n by the Court, Plaintiff will withdraw her pending 151).
 17 18 19 20 21 22 23 24 	Plaintiff has rescheduled Defendants' trial schedule. To avoid potential prejudice to issue arising from the re-scheduled deposition the twenty-one days' notice provided by local hearing date. Upon approval of this stipulatio motion to compel and for sanctions (ECF No. So stipulated. DATED: May 1, 2018	depositions to accommodate Defendants' counsel's Plaintiff, the parties stipulate that any discovery as may be heard on fourteen days' notice, rather than rule, with joint statements due seven days before the n by the Court, Plaintiff will withdraw her pending 151). NAGELEY, KIRBY & WINBERRY, LLP BY: <u>/s/ James R. Kirby II</u>
 17 18 19 20 21 22 23 24 25 	Plaintiff has rescheduled Defendants' trial schedule. To avoid potential prejudice to issue arising from the re-scheduled deposition the twenty-one days' notice provided by local hearing date. Upon approval of this stipulatio motion to compel and for sanctions (ECF No. So stipulated. DATED: May 1, 2018	depositions to accommodate Defendants' counsel's Plaintiff, the parties stipulate that any discovery as may be heard on fourteen days' notice, rather than rule, with joint statements due seven days before the n by the Court, Plaintiff will withdraw her pending 151). NAGELEY, KIRBY & WINBERRY, LLP SY: <u>/s/ James R. Kirby II</u> JAMES R. KIRBY II
 17 18 19 20 21 22 23 24 25 26 	Plaintiff has rescheduled Defendants' trial schedule. To avoid potential prejudice to issue arising from the re-scheduled deposition the twenty-one days' notice provided by local hearing date. Upon approval of this stipulatio motion to compel and for sanctions (ECF No. So stipulated. DATED: May 1, 2018	depositions to accommodate Defendants' counsel's Plaintiff, the parties stipulate that any discovery as may be heard on fourteen days' notice, rather than rule, with joint statements due seven days before the n by the Court, Plaintiff will withdraw her pending 151). NAGELEY, KIRBY & WINBERRY, LLP SY: _/s/ James R. Kirby II JAMES R. KIRBY II Attorney for Plaintiff DOROTHY RODDEN JACKSON
 17 18 19 20 21 22 23 24 25 26 27 	Plaintiff has rescheduled Defendants' trial schedule. To avoid potential prejudice to issue arising from the re-scheduled deposition the twenty-one days' notice provided by local hearing date. Upon approval of this stipulatio motion to compel and for sanctions (ECF No. So stipulated. DATED: May 1, 2018	depositions to accommodate Defendants' counsel's Plaintiff, the parties stipulate that any discovery as may be heard on fourteen days' notice, rather than rule, with joint statements due seven days before the n by the Court, Plaintiff will withdraw her pending 151). NAGELEY, KIRBY & WINBERRY, LLP SY: <u>/s/ James R. Kirby II</u> JAMES R. KIRBY II Attorney for Plaintiff

1	ELLIS LAW GROUP	
2		
3	BY:_/s/ Theresa M. LaVoie	
4	THERESA M. LAVOIE Attorney for Defendants	
5	RICHARD CALONE; CALONE & HARREL LAW GROUP, LLP; CALONE & BEATTIE,	
6	LAW OROUP, LLF, CALONE & BEATTIE, LLP; CALONE LAW GROUP, LLP,	
7		
8	Based on the stipulation of the parties and for good cause shown, the Court orders that any	
9	discovery issue arising from the re-scheduled depositions of Defendants in this matter may be	
10	heard on fourteen days' notice, rather than the twenty-one days' notice provided by local rule,	
11	with joint statements due seven days before the hearing date.	
12	SO ORDERED.	
13	Dated: May 3, 2018	
14		
15	Fordal J. Newman	
16	UNITED STATES MAGISTRATE JUDGE	
17		
18		
19		
20		
21		
22		
23		
24		
25		
26		
27		
28	- 2 -	
	Stipulation and Order Resolving Motion to Compel and for Sanctions (ECF. 151) - Case No.: 2:16-cv-00891-TLN-KJN	