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 CALONE & BEATTIE, LLP; CALONE LAW GROUP, LLP

8 UNITED STATES DISTRICT COURT  
 9 EASTERN DISTRICT OF CALIFORNIA

11 DOROTHY RODDEN JACKSON,

12 Plaintiff,

13 v.

14 RICHARD CALONE; CALONE & HARREL  
 LAW GROUP, LLP; CALONE & BEATTIE,  
 15 LLP; CALONE LAW GROUP, LLP,

16 Defendants.

Case No.: 2:16-cv-00891 TLN KJN

**STIPULATION AND ORDER TO MODIFY  
 THE SCHEDULING ORDER TO EXTEND  
 THE DEADLINE TO DISCLOSE EXPERTS**

**(Fed. R. Civ. P. 26)**

18 Plaintiff Dorothy Jackson and Defendants Richard Calone, Calone & Harrel Law Group, LLP,  
 19 Calone & Beattie, LLP, and Calone Law Group, LLP hereby agreed and request this Court to extend  
 20 the deadline to disclose experts pursuant to Federal Rules of Civil Procedure 26, by thirty days.  
 21 Currently, expert disclosure is scheduled for August 9, 2018, and the parties seek an extension of time  
 22 to September 10, 2018.

23 The parties require additional time to designate and prepare their experts based on several  
 24 factors. First, discovery in this case was delayed after Plaintiff notified Defendants that she was unable  
 25 to attend her deposition due to medical issues. This resulted in Defendants bringing a motion for  
 26 terminating sanctions, motions to compel, and the deposition of Plaintiff's medical expert. Plaintiff  
 27 eventually sought and obtained a protective order that her deposition not be taken.

1 Second, Plaintiff filed a motion to amend the Complaint which has not yet been ruled on.  
2 Depending on the outcome of this motion, additional issues may need to be addressed by the parties'  
3 experts.

4 Consequently, the parties have agreed and request this Court to move the expert disclosure  
5 deadline from August 9, 2018 to September 10, 2018. All other provisions of the scheduling order  
6 would remain the same.

7 So Stipulated:

8 Dated: July 17, 2018

9 NAGELY, KIRBY & WINBERRY, LLP

10  
11 By /s/ James R. Kirby II  
12 James R. Kirby II  
13 Attorney for Plaintiff  
DOROTHY RODDEN JACKSON

14 Dated: August 6, 2018

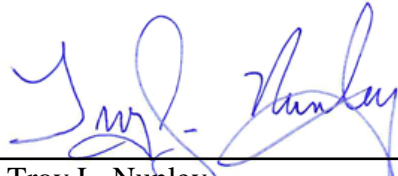
15 ELLIS LAW GROUP LLP

16 By /s/ Theresa M. LaVoie  
17 Theresa M. LaVoie  
18 Attorney for Defendants DEFENDANTS RICHARD  
19 CALONE; CALONE & HARREL LAW GROUP, LLP;  
20 CALONE & BEATTIE, LLP; CALONE LAW GROUP,  
21 LLP

22 Based on the stipulation of the parties and for good cause shown, the Court orders that the  
23 deadline to disclose experts shall be extended by thirty days from August 9, 2018 to September 10,  
24 2018.

25 SO ORDERED

26 Dated: August 6, 2018

27   
28 Troy L. Nunley  
United States District Judge