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8 UNITED STATES DISTRICT COURT
 9 EASTERN DISTRICT OF CALIFORNIA
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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.
 17
 18

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

**STIPULATION AND ORDER TO CONTINUE
 THE HEARING ON PLAINTIFF'S MOTION
 FOR SUMMARY JUDGMENT SO THAT
 DEFENDANTS CAN TAKE THE
 DEPOSITIONS OF PLAINTIFF'S EXPERT
 WITNESSES**

**DATE: JANUARY 10, 2019
 TIME: 2:00 A.M.
 DEPT. 2**

TRIAL DATE: NONE SET

19
 20 Plaintiff Dorothy Jackson and Defendants Richard Calone, Calone & Harrell Law Group, LLP,
 21 Calone & Beattie, LLP, and Calone Law Group, LLP, have agreed and hereby request this Court to
 22 continue the hearing date for Plaintiff's Motion for Partial Summary Judgment, and related deadlines for
 23 the Opposition and Reply to, Plaintiff's Motion is currently set to be heard in Department 2 on January
 24 10, 2019; Defendants' Opposition to the Motion is due on December 27, 2018.

25 The parties have agreed to continue the hearing to the first available date on the Court's calendar
 26 in March 2019 in order to provide Defendants additional time to depose and obtain transcripts from those
 27 depositions of two experts the Plaintiff relies upon in her moving papers, including the Separate Statement
 28 of Undisputed Facts and Evidence, to wit: (1) retained expert Robin Klomprens; and (2) non-retained

1 expert Dr. Lee Scaief.

2 On October 10, 2018, Defendants Noticed the Depositions Robin Klomprens for October 23,
3 2018, and Dr. Lee Scaief for November 6, 2018.

4 On October 19, 2018, Plaintiff's counsel informed Defendants' counsel that these experts were not
5 available for deposition on the dates noticed by Defendants.

6 After meeting and conferring on deposition dates, on or about November 20, 2018, Plaintiff's
7 counsel informed Defendants that the earliest date Robin Klomprens was available for deposition was
8 December 18, 2018, and that Dr. Scaief was not available for his deposition until December 19, 2018.
9 The depositions of these experts have now been noticed for December 18 and 19, 2018 respectively.

10 Defendants believe that the information from Plaintiff's experts listed above will raise a genuine
11 issue of material fact and therefore, that Plaintiff's Motion should be continued pursuant to Federal Rules
12 of Civil Procedure 56(d). Plaintiff does not agree that these depositions will raise genuine issues of facts,
13 but nevertheless does not oppose the request to continue the hearing date given the limited availability of
14 these two experts.

15 Consequently, the parties have agreed and request this Court to continue the hearing date of
16 Plaintiff's Motion For Partial Summary Judgment, and all associated briefing deadlines, from January 10,
17 2019 to the earliest date on the Court's calendar in March 2019.

18 The parties further agree that the Opposition and Reply deadlines will be calculated from the new
19 hearing date.

20 IT IS SO STIULATED

21 Dated: December 6, 2018

22 ELLIS LAW GROUP LLP

23 By /s/ Theresa M. LaVoie

24 Theresa M. LaVoie

25 Attorney for Defendants

26 RICHARD CALONE, CALONE & HARREL LAW
27 GROUP, LLP, CALONE & BEATTIE, LLP, AND
28 CALONE LAW GROUP, LLP

1 Dated: December 6, 2018

NAGELEY, KIRBY & WINBERRY, LLP

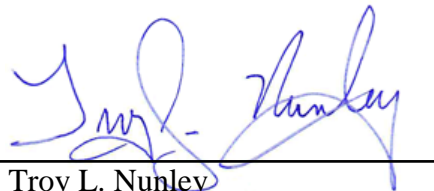
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3 By /s/ Lanny T. Winberry
4 Lanny T. Winberry
5 Attorneys for Plaintiff
6 DOROTHY RODDEN JACKSON

7 **ORDER**

8 Based on the Stipulation by the parties, and for good cause shown, the Court orders that the January
9 10, 2019 hearing date on Plaintiff's Motion for Partial Summary Judgment is hereby vacated and
10 rescheduled for March 7, 2019, at 2:00 PM, including all associated briefing deadlines. The Opposition
11 and Reply deadlines will be calculated from the new hearing date.

12 IT IS SO ORDERED.

13 Dated: December 6, 2018

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17 Troy L. Nunley
18 United States District Judge