1 2 3 4 5 6 7 8 9 10 11 12	XAVIER BECERRA, State Bar No. 118517 Attorney General of California PETER D. HALLORAN, State Bar No. 184025 Supervising Deputy Attorney General LAUREN E. SIBLE, State Bar No. 273641 Deputy Attorney General 1300 I Street, Suite 125 P.O. Box 944255 Sacramento, CA 94244-2550 Telephone: (916) 324-8630 Fax: (916) 324-5567 E-mail: Lauren.Sible@doj.ca.gov Attorneys for Defendant California Employment Development Department IN THE UNITED STAT				
13	PATRICIA A. WILLIAMS,	2:16-CV-0113	35-WBS-CKD		
14	Plaintiff,	STIPULATI	ON		
15	v.	Judge:	The Honorable William B.		
16		Trial Date:	Shubb April 17, 2018		
17 18	STATE OF CALIFORNIA EMPLOYMENT DEVELOPMENT DEPARTMENT,		May 25, 2016		
19	Defendant.				
20					
21	Whereas, this Court issued a pre-trial scheduling order on October 18, 2016,				
22	Whereas, the parties, having diligently conducted discovery in this matter thus far,				
23	including: depositions of three of Defendant witnesses, which took place on February 14, 2017;				
24	the first day of Plaintiff's deposition, which took place on February 28, 2017; and written				
25	discovery,				
26	Whereas, the parties intend to conduct additional discovery, including: the second day of				
27	Plaintiff's deposition (tentatively scheduled for May 24, 2017, pending receipt of Plaintiff's				
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	Stipulation and [Proposed] Order (2:16-CV-01135-WBS-CKD)				

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2	remaining document production and availability of counsel); additional written discovery; and a				
	mental examination of Plaintiff to evaluable her claim for emotional distress,				
3	Whereas, the parties anticipate the need for additional time to complete necessary				
4	discovery and trial preparation in an orderly manner,				
5	IT IS STIPULATED AND AGREED, by and between the undersigned and attorneys for				
6	the parties herein:				
7	The Court is requested to adopt a new scheduling order, expending the following deadlines				
8	as follows:				
9	Disclose experts and produce reports on or before August 31, 2017;				
10	Disclose rebuttal expert and reports on or before September 31, 2017; and				
11	All other discovery to be completed by October 31, 2017.				
12	The order and directions of this Court contained in its Status (Pretrial Scheduling) Order				
13	dated October 18, 2016, otherwise remain in full force and effect.				
14	dated October 18, 2010, otherwise remain in fun force and effect.				
15	D . 1 . 1 . 10 . 2017				
16	Dated: <u>April 18, 2017</u>	Respectfully submitted,			
17		<u>/s/Richard M. Rogers</u> Law Office of Richard M. Rogers			
18		RICHARD M. ROGERS Attorney for Plaintiff Patricia A. Williams			
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20					
21	Dated: April 18, 2017	XAVIER BECERRA			
22	_ <u>_</u>	Attorney General of California PETER D. HALLORAN, Supervising Deputy			
23		Attorney General			
23 24		<u>/s/Lauren E. Sible</u> Lauren E. Sible			
25		Deputy Attorney General Attorneys for Defendant, California			
23 26		Employment Development Department			
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	Stipulation and [Proposed] Order (2:16-CV-01135-WBS-CKD)				

1	IN THE UNITED STATES DISTRICT COURT			
2	FOR THE EASTERN DISTRICT OF CALIFORNIA			
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6	PATRICIA A. WILLIAMS ,2:16-	-CV-01135-WBS-CKD		
7	Plaintiff, ORI	DER		
8	8 v.			
9	STATE OF CALIFORNIA			
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11				
12	Defendant.			
13				
14	The Court, having considered the parties' stipulation seeking to extend the pre-trial			
15	schedule, approves the following schedule changes to extend the following dates as follows:			
16	Disclose experts and produce reports on or before August 31, 2017;			
17	Disclose rebuttal expert and reports on or before September 29, 2017; and			
18	All other discovery to be completed by October 31, 2017.			
19	The order and directions of this Court contained	The order and directions of this Court contained in its Status (Pretrial Scheduling) Order		
20	dated October 18, 2016, otherwise remain in full force and effect.			
21				
22	IT IS SO ORDERED:	1		
22		m & Ahobe		
23 24	UNITED STAT	TES DISTRICT JUDGE		
25 26				
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	Stipulation and [Proposed] Order (2:16-CV-01135-WBS-CKD)			