

1 Michael R. Mordaunt, Esq., Bar No. 66911
 Lori A. Reihl, Esq., Bar No. 246395
 2 RIGGIO MORDAUNT & KELLY
 A Professional Law Corporation
 3 2509 West March Lane, Suite 200
 Stockton, CA 95207
 4 Telephone: (209) 473-8732

5 Attorneys for Defendant
 TARGET CORPORATION

6
 7
 8 UNITED STATES DISTRICT COURT
 9 EASTERN DISTRICT OF CALIFORNIA

10 SHERON R. WRIGHT,) Case No. 2:16-CV-01193-JAM-CKD
 11)
 Plaintiff(s),) **STIPULATION TO EXTEND DEADLINES**
 12) **AND [PROPOSED] ORDER**
 vs.)
 13)
 TARGET CORPORATION,)
 14)
 Defendant(s).)
 15)

16 WHEREAS the parties previously entered into a stipulation, and an order was entered by
 17 this court on August 16, 2017, to continue the dates concerning disclosure of expert witnesses. The
 18 deadline for mutual disclosure of expert witnesses and exchange of expert reports is now October
 19 20, 2017, and the mutual disclosure of rebuttal expert witnesses and exchange of reports deadline is
 20 November 17, 2017.

21 However, by that stipulation and order, the parties inadvertently did not extend discovery
 22 deadlines, leaving the parties with a date for expert disclosures *after* the current discovery deadline
 23 of September 15, 2017. Therefore, an extension of time on all case deadlines and dates is necessary
 24 to allow time for time for the completion of expert disclosures and discovery, including expert
 25 depositions, prior to the close of discovery and in sufficient time prior to trial and motion deadlines.

26 Based on the foregoing:

27 ///
 28 ///

Riggio Mordaunt & Kelly
 2509 W March Lane
 Suite 200
 Stockton, CA 95207
 (209) 473-8732

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

IT IS HEREBY STIPULATED AND AGREED that:

1. The current discovery cut-off date of September 15, 2017 shall be extended to January 19, 2018.

2. The current dispositive motion deadline of November 7, 2017 shall be extended to March 16, 2018 and heard on April 17, 2018 at 1:30pm.

IN ADDITION, the parties request that:

1. The Final Pretrial Conference currently scheduled for January 12, 2018 be continued to May 18, 2018.

2. The jury trial currently scheduled to commence on February 26, 2018 be continued to June 25, 2018.

Dated: September 11, 2017

AMERIO LAW FIRM

By: /s/ ASHLEY AMERIO
Ashley Amerio, Esq.
Jeffrey Fletterick, Esq.
Attorney for Plaintiff
SHERON R. WRIGHT

Dated: September 12, 2017

RIGGIO MORDAUNT & KELLY

By: /s/ LORI A. REIHL
Lori A. Reihl, Esq.
Attorneys for Defendant
TARGET CORPORATION

ORDER (AS MODIFIED BY THE COURT)

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Good cause having been shown,

IT IS HEREBY ORDERED that the parties to this matter that the court's Scheduling Order relative to this matter is modified as follows:

1. Discovery shall be completed by January 19, 2018.
2. All dispositive motions shall be filed by March 27, 2018 and heard on April 24, 2018 at 1:30pm.
3. The Final Pretrial Conference is set for June 1, 2018 at 10:00AM in Courtroom 6.
4. Jury Trial is set for July 9, 2018 at 9:00am in Courtroom 6.

DATED: September 12, 2017

/s/ John A. Mendez
Judge of the United States District Court