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8 **UNITED STATES DISTRICT COURT**
9 **EASTERN DISTRICT OF CALIFORNIA**
10 **SACRAMENTO DIVISION**

11 TELEVISION EDUCATION, INC.) Case No. 2:16-cv-01433-WBS-EFB
12)
Plaintiff,) **STIPULATION AND [PROPOSED]**
13 vs.) **ORDER TO MODIFY STATUS**
) **(PRETRIAL SCHEDULING) ORDER TO**
14 CONTRACTORS INTELLIGENCE SCHOOL,) **EXTEND TIME TO COMPLETE EXPERT**
INC.; CONTRACTORS PUBLISHER, INC.;) **DISCOVERY**
15 LEONID VORONTSOV; OKSANA)
VORONTSOV; and DOES 1-25,)
16)
Defendants.)
17)

18 Plaintiff Television Education, Inc. ("Television Education") and Defendants Contractors
19 Intelligence School, Inc.; Contractors Publisher, Inc.; Leonid Vorontsov and Oksana Vorontsov
20 ("Defendants"), by and through their undersigned counsel of record, hereby stipulate as follows
21 and propose that the Court enter an order consistent with this Stipulation.

22 WHEREAS, pursuant to the Status (Pretrial Scheduling) Order filed October 19, 2016, the
23 deadline for parties to disclose experts and produce reports in accordance with Federal Rule of
24 Civil Procedure 26(a)(2) is March 31, 2017; the deadline to disclose rebuttal experts and produce
25 reports is April 28, 2017; and the deadline to complete discovery is May 31, 2017; and

26 WHEREAS, Plaintiff and Defendants have been diligently engaged in factual and
27 percipient witness discovery; and
28

1 WHEREAS, despite their diligence, and due to the schedules of witnesses and counsel, the
2 parties do not anticipate they will be able to complete factual and percipient witness discovery and
3 depositions in time to comply with the March 31 deadline to disclose experts; and

4 WHEREAS, the parties have not requested any prior modification of the Status (Pretrial
5 Scheduling) Order; and

6 WHEREAS, Plaintiff and Defendants agree and stipulate that parties should have an
7 additional 30 days within which to complete expert discovery;

8 IT IS HEREBY STIPULATED AND AGREED that good cause exists for this Court to
9 enter an Order modifying the Status (Pretrial Scheduling) Order so that the deadline to disclose
10 experts shall be extended to May 1, 2017; the deadline to disclose rebuttal experts shall be
11 extended to May 30, 2017; and the deadline to complete expert discovery only shall be extended to
12 June 30, 2017.

13 **SO STIPULATED:**

14
15 DATED: February 10, 2017

BOUTIN JONES INC.

16 By: /s/MICHAEL E. CHASE

17 MICHAEL E. CHASE
18 BASHAR AHMAD

19 Attorneys for Plaintiff Television Education, Inc.

20
21 DATED: February 10, 2017

TINGLEY LAW GROUP, PC

22 By: /s/ STEPHEN D. COLLINS (W/ PERMISSION)

23 STEPHEN D. COLLINS

24 Attorneys Defendants Contractors Intelligence
25 School, Inc.; Contractors Publisher, Inc.; Leonid
26 Vorontsov and Oksana Vorontsov


1 **ORDER MODIFYING STATUS (PRETRIAL SCHEDULING) ORDER TO EXTEND TIME**
2 **TO COMPLETE EXPERT DISCOVERY**

3 Upon the stipulation of Plaintiff Television Education, Inc. and Defendants Contractors
4 Intelligence School, Inc.; Contractors Publisher, Inc.; Leonid Vorontsov and Oksana Vorontsov, by
5 and through their respective counsel, and good cause appearing,

6 **IT IS ORDERED** that the Status (Pretrial Scheduling) Order is modified so that the
7 deadline to disclose experts and produce reports in accordance with Federal Rule of Civil
8 Procedure 26(a)(2) shall be extended to May 1, 2017; the deadline to disclose rebuttal experts and
9 produce reports shall be extended to May 30, 2017; and the deadline to complete expert discovery
10 only shall be extended to June 30, 2017.

11 **IT IS SO ORDERED**

12 Dated: February 13, 2017

13 
14 WILLIAM B. SHUBB
15 UNITED STATES DISTRICT JUDGE