

1 DAVID E. MASTAGNI, ESQ. (SBN 204244)  
 2 ISAAC S. STEVENS, ESQ. (SBN 251245)  
 3 ACE T. TATE, ESQ. (SBN 262015)  
 4 **MASTAGNI HOLSTEDT**  
 5 *A Professional Corporation*  
 6 1912 "I" Street  
 7 Sacramento, California 95811  
 8 Telephone: (916) 446-4692  
 9 Facsimile: (916) 447-4614  
 10 davidm@mastagni.com  
 11 istevens@mastagni.com  
 12 atate@mastagni.com

13 Attorneys for Plaintiffs

14 MORIN I. JACOB, ESQ. (SBN 204598)  
 15 RICHARD C. BOLANOS, ESQ. (SBN 111343)  
 16 LISA S. CHARBONNEAU, ESQ. (SBN 245906)  
 17 **LIEBERT CASSIDY WHITMORE**  
 18 135 Main Street, 7th Floor  
 19 San Francisco, California 94105  
 20 Telephone: (415) 512-3000  
 21 Facsimile: (415) 856-0306  
 22 rbolanos@lcwlegal.com  
 23 mjacob@lcwlegal.com  
 24 lcharbonneau@lcwlegal.com

25 Attorneys for Defendant

26 UNITED STATES DISTRICT COURT

27 EASTERN DISTRICT OF CALIFORNIA - SACRAMENTO

28 DEBRA HOFFMAN on behalf of herself  
 and all similarly situated individuals,  
 Plaintiffs,  
 v.  
 COUNTY OF BUTTE,  
 Defendant.

Case No.: 2:16-cv-01487-MCE-AC

Complaint Filed: June 30, 2016

**STIPULATION AND ORDER TO EXTEND  
DISCOVERY CUTOFF AND RELATED  
DEADLINES FOR GOOD CAUSE**

Plaintiffs DEBRA HOFFMAN, et al. ("Plaintiffs") and Defendant COUNTY OF BUTTE ("Defendant"), by and through their respective counsel, hereby stipulate as follows:

WHEREAS, this putative collective action was filed on June 30, 2016, asserting that

1 Defendant violated the overtime payment provisions of the Fair Labor Standards Act (“FLSA”);  
2 WHEREAS, On May 25, 2017 the Court referred this case to Magistrate Judge Gregory  
3 G. Hollows for settlement conference, and continued the discovery cutoff to August 29, 2017, as  
4 requested by counsel.

5 WHEREAS, the parties are working diligently towards settlement of all issues in this case.  
6 The parties desire additional time to exhaust settlement efforts before engaging in further  
7 litigation and trial preparation.

8 NOW THEREFORE, the Parties stipulate and respectfully submit that:

9 Good cause exists to continue the August 29, 2017 discovery cut off for 90 days, or to  
10 November 27, 2017; continue the expert disclosure date to 60 days after November 27, 2017;  
11 continue the supplemental expert disclosure date to 90 days after November 27, 2017; and  
12 continue the dispositive motion cut-off to 180 days from the new discovery cutoff of November  
13 27, 2017.

14 Dated: August 14, 2017

LIEBERT CASSIDY WHITMORE

15  
16  
17 By: /s/ Lisa S. Charbonneau  
18 MORIN I. JACOB, ESQ.  
19 RICHARD C. BOLANOS, ESQ.  
LISA S. CHARBONNEAU, ESQ  
Attorneys for Defendant

20 Dated: August 14, 2017

MASTAGNI HOLSTEDT

21  
22  
23 By: /s/ David E. Mastagni  
24 DAVID E. MASTAGNI, ESQ.  
25 ISAAC S. STEVENS, ESQ.  
26 ACE T. TATE, ESQ.  
IAN SANGSTER, ESQ.  
Attorneys for Plaintiffs

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

**ORDER**

IT IS HEREBY ORDERED, based on the Parties' stipulation and for good cause shown,  
that:

The August 29, 2017 discovery cut off is continued for 90 days, or to November 27, 2017.  
The expert disclosure date is continued to 60 days after November 27, 2017. The supplemental  
expert disclosure date is continued to 90 days after November 27, 2017. The dispositive motion  
cut-off is continued to 180 days from the new discovery cutoff of November 27, 2017.

**IT IS SO ORDERED**

Dated: August 15, 2017

  
MORRISON C. ENGLAND, JR.  
UNITED STATES DISTRICT JUDGE