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14 Attorneys for Defendants  
PINNACLE PROPERTY MANAGEMENT  
15 SERVICES, LLC and PINNACLE PROPERTY  
MANAGEMENT SERVICES PIER 70  
16

17 **UNITED STATES DISTRICT COURT**  
18 **EASTERN DISTRICT OF CALIFORNIA**  
19

20 BRENNA CALLAHAN,

21 Plaintiff,

22 vs.

23 PINNACLE PROPERTY MANAGEMENT  
SERVICES, LLC, a Delaware Limited Liability  
24 Company; PINNACLE PROPERTY  
MANAGEMENT SERVICES PIER 70, a  
25 business organization, form unknown; and  
DOES 1 to 100, inclusive,  
26

27 Defendants.  
28

Case No. 2:16-cv-01862-MCE-EFB

**JOINT STIPULATION TO EXTEND  
DATE TO FILE JOINT DISCOVERY  
PLAN; ORDER**

Complaint Filed: 06/23/2016  
Removal Filed: 08/05/2016  
Trial Date: TBA

1 WHEREAS, PINNACLE PROPERTY MANAGEMENT SERVICES, LLC and  
2 PINNACLE PROPERTY MANAGEMENT SERVICES PIER 70 (collectively referred to as  
3 “Defendants”) and BRENNNA CALLAHAN (“Plaintiff”) (collectively the “Parties”);

4 WHEREAS, the Court filed its Revised Initial Pretrial Scheduling Order (“Pretrial  
5 Scheduling Order”) on August 12, 2016;

6 WHEREAS, the Pretrial Scheduling Order requires the Parties to confer within 60 days  
7 of the date of removal as required by Federal Rule of Civil Procedure 26(f);

8 WHEREAS, the Pretrial Scheduling Order requires the Parties to prepare and submit to  
9 the Court the Rule 26(f)(3) discovery plan (“Discovery Plan”) within 14 days of the Parties’  
10 conference, which deadline is October 17, 2016; and

11 WHEREAS, the Parties have conferred and mutually desire to explore early resolution of  
12 this action and avoid unnecessary expenditure of time and fees on formal litigation.

13 THEREFORE, good cause exists for this stipulation and order to continue the deadline for  
14 filing the Discovery Plan pursuant to the Pretrial Scheduling Order so that the Parties may explore  
15 potential settlement without concurrently incurring further litigation costs and fees.

16 WHEREFORE, the Parties hereby jointly stipulate and request an order as follows:

17 The current deadline of October 17, 2016, to file a Discovery Plan pursuant to Rule  
18 26(f)(3) will be continued until December 16, 2016 (60 additional days).

19 **IT IS SO STIPULATED.**

20 Dated: October 12, 2016

**Shimoda Law Corp.**

21 By: /s/ Galen T. Shimoda [as authorized. on 10.12.16]

22 GALEN T. SHIMODA

23 ERIKA R. C. SEMBRANO

24 Attorneys for Plaintiff

25 BRENNNA CALLAHAN

1 Dated: October 12, 2016

JACKSON LEWIS P.C.

2  
3 By: /s/ Heath A. Havey

4 JAMES T. JONES  
HEATH A. HAVEY

5 Attorneys for Defendants  
PINNACLE PROPERTY MANAGEMENT  
SERVICES, LLC and PINNACLE PROPERTY  
6 MANAGEMENT SERVICES PIER 70


7  
8 **ORDER**

9 Pursuant to the parties' stipulation and good cause appearing, in order to promote  
10 settlement efforts, IT IS HEREBY ORDERED AS FOLLOWS:

11 The terms of the above Stipulation are hereby approved and adopted. The Parties have an  
12 additional sixty days (until December 16, 2016) to file a discovery plan pursuant to Rule 26(f)(3).

13 IT IS SO ORDERED.

14 Dated: October 21, 2016

15   
16 MORRISON C. ENGLAND, JR.  
17 UNITED STATES DISTRICT JUDGE