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7 **Attorneys for Defendant GLOBAL AVIATION**  
**SERVICES, LLC (named and served herein as**  
8 **“NORTH CAROLINA AVIATION SERVICES dba/aka**  
**GLOBAL AVIATION SERVICES LLC”)**  
9

10 **UNITED STATES DISTRICT COURT**  
11 **EASTERN DISTRICT OF CALIFORNIA, SACRAMENTO DIVISION**  
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13 DAMIAN J. WILLIAMS,  
14

Plaintiff,

v.

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16 NORTH CAROLINA AVIATION SERVICES,  
17 dba/aka GLOBAL AVIATION SERVICES,  
18 LLC, DELTA AIRLINES; and DOES 1 through  
10, inclusive,

Defendants.  
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Case No. 2:16-CV-02089-VGC

**STIPULATION REQUESTING**  
**MODIFICATION OF NOVEMBER 22, 2016**  
**ORDER SETTING TRIAL MANAGEMENT**  
**SCHEDULE AFTER HEARING ON**  
**INITIAL CASE MANAGEMENT**  
**CONFERENCE PURSUANT TO FRCP 16;**  
**LOCAL RULE 16-240; ~~PROPOSED~~**  
**ORDER**

21 IT IS HEREBY STIPULATED by and between the undersigned parties, by and through their  
22 attorneys of record, as follows:

23 The parties agree and request that this Honorable Court modify its November 22, 2016 Order  
24 After Hearing on Initial Case Management Conference Setting Trial Management Schedule based on  
25 good cause for the following reasons:

26 1. This is a personal injury case based upon allegations of negligence, which arises from  
27 a workplace accident at the Sacramento International Airport (“SMF”) on February 19, 2016,  
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STIPULATION REQUESTING MODIFICATION OF NOVEMBER 22, 2016 ORDER SETTING TRIAL MANAGEMENT SCHEDULE  
AFTER HEARING ON INITIAL CASE MANAGEMENT CONFERENCE PURSUANT TO FRCP 16; LOCAL RULE 16-240;  
[PROPOSED] ORDER

1 allegedly involving a tug. Plaintiff was a ramp agent employed by GAT Airline Ground Support  
2 ("GAT"). GAT provides support services for certain airlines at SMF, including Delta. The parties  
3 understand that GAT maintains personnel files regarding its employees, including Plaintiff, as well  
4 as maintenance records concerning equipment used by its employees.

5 2. On November 22, 2016, the Initial Case Management Conference was held in this  
6 case.

7 3. On November 22, 2016, the Honorable District Judge Vincent Chhabria issued an  
8 Order After Hearing, setting forth the Trial Management Schedule for this case as follows:

9 Fact discovery cut-off	8/18/2017
10 Expert disclosure	8/18/2017
11 Expert rebuttal	9/8/2017
12 Expert discovery cut-off	9/29/2017
13 Last day to file Dispositive 14 Motions	10/6/2017 (contact CRD re preferred location of hearing)
15 Pretrial conference	2/5/2018 (1:30 p.m. in S.F.)
16 Jury Trial	2/12/2018 (8:30 a.m. in Sac.)
17 Number of trial days	TBD at PTC

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19 4. Since issuance of the foregoing Trial Management Schedule, the parties have been  
20 diligent in pursuing discovery, including written discovery, subpoenaing of medical and employment  
21 records and scheduling of depositions.

22 5. However, despite the parties' efforts to complete discovery in this case prior to the  
23 current cut-off date of August 18, 2017, the parties will be unable to do so.

24 6. While the parties subpoenaed Plaintiff's employment records and maintenance  
25 records relevant to this case from Plaintiff's employer, GAT, in November of 2016 and February of  
26 2017, GAT's counsel has not completed his review of such subpoenaed records and has not yet  
27 provided these records to the parties to this case. The parties understand that the GAT daily

1 inspection sheets for all equipment should be included in the subpoenaed GAT records. It will be  
2 critical to this case to depose the GAT personnel who signed off on the equipment in the days  
3 leading up to the subject incident. Despite numerous requests to counsel for GAT, these documents  
4 have not yet been made available, which has caused a delay in the parties' deposition schedule.

5 7. Accordingly, the parties agree and request that this Honorable Court modify its Trial  
6 Management Schedule Order as follows:

7 That the fact discovery deadline shall be extended 30 days to 9/18/2017;

8 That the expert witness disclosure date shall be extended 30 days to 9/18/2017;

9 That the expert rebuttal date shall be extended 30 days to 10/9/2017;

10 That the expert discovery cut-off shall be extended 30 days to 10/30/2017;

11 That the last day to file dispositive motions shall be extended 30 days to 11/6/2017.

12 8. The parties agree that this modification will best serve the parties' interests in light of  
13 the discovery which remains to be completed in this case in order to adequately prepare the case for  
14 trial.

15 **IT IS SO STIPULATED.**

16 Dated: June 8, 2016

**DREYER BABICH BUCCOLA WOOD  
CAMPORA, LLP**

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19 By: /s/ Daniel G. Scheiderman  
20 Daniel G. Schneiderman, Esq.  
21 Attorneys for Plaintiff  
DAMIAN J. WILLIAMS

22 Dated: June 8, 2016

**DONAHUE DAVIES LLP**

23  
24 By: /s/ Robert E. Davies  
25 Robert E. Davies, Esq.  
26 Mary A. Stewart, Esq.  
27 Gregory A. Nelson, Esq.  
Attorneys for Defendant  
GLOBAL AVIATION SERVICES, LLC

1 Dated: June 8, 2016

**REID AXELROD**

2  
3 By: /s/Donald S. Honigman  
4 Donald S. Honigman, Esq.  
5 Attorneys for Defendant  
6 DELTA AIR LINES, INC.  
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1 **[PROPOSED] ORDER ON STIPULATION FOR MODIFICATION OF ORDER SETTING**  
2 **TRIAL MANAGEMENT SCHEDULE**

3 Pursuant to the foregoing Stipulation for Modification of Order Setting Trial Management  
4 Schedule, and good cause appearing therefore,

5 **IT IS ORDERED** that Trial Management Schedule Order is modified as follows:

6 The fact discovery deadline shall be extended to 9/18/2017;

7 The expert witness disclosure date shall be extended to 9/18/2017;

8 The expert rebuttal date shall be extended to 10/9/2017;

9 The expert discovery cut-off shall be extended to 10/30/2017;

10 The last day to file dispositive motions shall be extended to 11/6/2017.

11 **IT IS SO ORDERED.**

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13 Dated: June 19, 2017



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15 Vincent Chhabria  
16 United States District Judge  
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