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Attorneys for Plaintiffs

8 **UNITED STATES DISTRICT COURT**  
 9 **EASTERN DISTRICT OF CALIFORNIA**

10 JENNIFER URPS, an individual,  
 11 JAMES URPS, an individual, and  
 12 JOSHUA URPS, an individual

Plaintiffs,

v.

14 JOHN CURTIS SKAGGS, an individual,  
 15 RIVERSIDE TRANSPORT INC., a  
 Delaware corporation; PENSKE TRUCK  
 16 LEASING CORPORATION, a Delaware  
 corporation; and DOES 1 through 15,  
 17 inclusive,

Defendants.

Case No.: 2:16-CV-02185-VC  
 THE HONORABLE VINCE CHHABRIA

**STIPULATION AND ~~PROPOSED~~  
~~ORDER~~ TO EXTEND MEDIATION  
 CUT-OFF AND MODIFY TRIAL  
 MANAGEMENT SCHEDULE**

Case Removed: September 14, 2016

IT IS HEREBY STIPULATED by the parties, through their attorneys of record, as follows:

WHEREAS, pursuant to the Court’s December 6, 2016 Order After Hearing on Initial Case Management Conference, Document 2, jury trial is scheduled for November 13, 2017. The parties do not seek a continuance of the November 13, 2017 trial date.

WHEREAS, pursuant to the Court’s December 6, 2016 Order, Document 2, the deadline to complete mediation is May 1, 2017.

WHEREAS, pursuant to the Court’s December 6, 2016 Order, Document 2, the fact discovery cut-off is June 22, 2017.

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1 WHEREAS, pursuant to the Court's December 6, 2016 Order, Document 2, the deadline  
2 for initial expert disclosures is May 31, 2017; the deadline for disclosure of rebuttal experts is June  
3 21, 2017; and the deadline for closure of expert discovery is July 18, 2017.

4 WHEREAS, the parties have agreed to mediate this matter with Hon. Cecily Bond (Ret.).

5 WHEREAS, the parties agree that a sixty (60) day continuance of the May 1, 2017  
6 mediation cut off will result in a more meaningful mediation. The parties further agree that a sixty  
7 (60) day continuance of the June 22, 2017 fact discovery cut off and the May 31, 2017 deadline for  
8 initial expert disclosures (and related expert deadlines), will benefit all parties and increase the  
9 chance mediation with Judge Bond will resolve the pending litigation.

10 IT IS HEREBY STIPULATED that:

- 11 1. Mediation cutoff be continued for sixty (60) days. The new mediation cutoff will be June 30,  
12 2017.
- 13 2. Fact discovery cutoff be continued for sixty (60) days. The new fact discovery cutoff will be  
14 August 21, 2017.
- 15 3. Initial Expert Disclosure, and related expert dates, be continued for sixty (60) days. The new  
16 Initial Expert Disclosure will be July 31, 2017; the new Rebuttal Expert Disclosure will be  
17 August 21, 2017; the new Close of Expert Discovery will be September 18, 2017.

18  
19 Dated: April 10, 2017

**ERIC RATINOFF LAW CORP.**

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22 By: /s/ MARLA C. STRAIN

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1 Dated: April 10, 2017

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By: /s/ BRADFORD G. HUGHES (with permission)  
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IT IS SO ORDERED.

Dated: April 14, 2017



UNITED STATES DISTRICT JUDGE