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8 UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA

11 ANTONIO A. LOPEZ,
12 Plaintiff,
13 v.
14 PRE-EMPLOY.COM, INC.,
15 Defendant.

CASE NO. 2:16-cv-02205-TLN-KJN
**SECOND STIPULATION TO AMEND
PRE-TRIAL SCHEDULING ORDER TO
EXTEND THE DEADLINE TO DISCLOSE
EXPERT WITNESSES**
Complaint Filed: September 15, 2016

17 Pursuant to Federal Rules of Civil Procedure, Rule 16(b)(4), and Local Rule 144(d),
18 Plaintiff Antonio A. Lopez (“Plaintiff”) and Defendant Pre-employ.com, Inc. (“Pre-employ”)
19 (collectively, the “Parties”), by and through their respective counsel of record, hereby agree and
20 stipulate to as follows:

- 21 1. On September 15, 2016, Plaintiff filed his Complaint. ECF No. 1.
- 22 2. On September 16, 2016, this Court issued Summons for Pre-employ and directed
23 Pre-employ to respond to Plaintiff’s Complaint within 21 days after service of the Summons.
- 24 3. On October 14, 2016, Plaintiff served the Summons and Complaint on Pre-
25 employ.
- 26 4. On October 26, 2016, pursuant to Local Rule 144(a), Plaintiff and Defendant
27 stipulated to Defendant’s first request for a 28-day extension to respond to Plaintiff’s Complaint.
28 ECF No. 4.

1 5. On December 2, 2016, Pre-employ filed its Answer to Plaintiff's Complaint. ECF
2 No. 7.

3 6. On January 19, 2017, this Court issued its Pretrial Scheduling Order. ECF No. 10.
4 The Pretrial Order set the following deadlines:

- 5 a. Deadline to conduct and complete fact discovery: February 1, 2018;
- 6 b. Deadline to disclose expert witnesses: April 5, 2018;
- 7 c. Deadline to hear dispositive motions by: August 9, 2018;
- 8 d. Final Pretrial Conference date: November 1, 2018;
- 9 e. Joint Final Pretrial Conference date: October 25, 2018;
- 10 f. Trial date: January 7, 2019.

11 7. On January 11, 2018, this Court issued an order extending fact discovery to March
12 1, 2018. ECF No. 15.

13 8. According to Federal Rules of Civil Procedure, Rule 16(b)(4), and Local Rule
14 144(d), the Parties now request this Court to extend the deadline to make expert disclosures **to**
15 **May 1, 2018.**

16 9. Good cause exists to grant this request to allow this extension of the expert
17 disclosure deadline for a short period consistent with the prior extension of the discovery cut off
18 in that the extension will allow reasonable time for expert analysis of the later discovery. In
19 particular, the parties have not yet completed all of the discovery noticed to be completed
20 pursuant to the revised discovery cut off deadline of March 1, 2018 and do not expect the
21 remaining depositions to be completed until April 13, 2018, well after the current expert
22 disclosure deadline of April 5, 2018. Therefore, the Parties wish to extend the initial deadline to
23 disclose expert witnesses to May 1, 2018.

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10. Accordingly, the Parties stipulate to the Court extending the deadline to disclose expert witnesses to **May 1, 2018**.

IT IS SO STIPULATED.

Dated: March 26, 2018

ROPERS, MAJESKI, KOHN & BENTLEY

By: /s/ Timothy J. Lepore
LAWRENCE BORYS
TIMOTHY J. LEPORE
Attorneys for Defendant
PRE-EMPLOY.COM, INC.

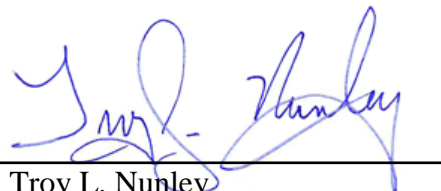
Dated: March 26, 2018

LAW OFFICES OF JOHN B. KEATING

By: /s/ John B. Keating
(as authorized on March 26, 2018)
JOHN B. KEATING
Attorneys for Plaintiff
ANTONIO A. LOPEZ

IT IS SO ORDERED.

Dated: March 28, 2018


Troy L. Nunley
United States District Judge