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AMERICAN PASTEURIZATION COMPANY, LLC			
UNITED ST	UNITED STATES DISTRICT COURT		
EASTERN DISTRICT OF CALIFORNIA			
JOSE ARANDA,) Case No. 2:16-cv-02242-WBS-AC		
Plaintiff,	 STIPULATION AND [PROPOSED] ORDEI TO MODIFY SCHEDULING ORDER 		
vs.			
AMERICAN PASTEURIZATION COMPAULLC; and DOES 1 through 100, inclusive,	NY,) Complaint filed: February 18, 2016		
Defendants.))		
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Pursuant to Rule 16(b) of the Federal Rules of Civil Procedure, Local Rules 240 and 270, and the Court's Pretrial Scheduling Order, Plaintiff Jose Aranda and Defendant American Pasteurization Company ("Defendant" or "APC") (collectively the "Parties") hereby submit this Stipulation and [Proposed] Order to Modify the Pretrial Scheduling Order. The Parties request that the Court modify the Pretrial Scheduling Order and continue the expert witness disclosure dates by five (5) months as set forth below.

IT IS HEREBY STIPULATED BY AND BETWEEN THE PARTIES TO THIS ACTION, through their counsel of record, as follows:

1. WHEREAS, on January 24, 2017, this Court issued a Pretrial Scheduling Order (the "Scheduling Order") in this matter.

2. WHEREAS, pursuant to the Scheduling Order, the deadline for expert witness disclosures is July 28, 2017, and the deadline for rebuttal expert witness disclosures is August 31, 2017.

3. WHEREAS, the Parties' deadline to file and serve motions is November 20, 2017.

4. WHEREAS, the Parties anticipate mediating this case in the summer of 2017, and agree that mediation may resolve some or all of the claims at issue in this case.

5. WHEREAS, if mediation is unsuccessful in resolving the case in its entirety, Defendant intends to file a dispositive motion on or before the November 20, 2017 deadline, which may dispose of the case or narrow the issues to be addressed at trial.

6. WHEREAS, both parties wish to avoid the incurrence of expert witness fees and costs (or rebuttal witness fees and costs), as well as associated written discovery, depositions, and meet and confer efforts, if some or all of the case may be disposed of via settlement or other means.

7. WHEREAS, the Parties have met and conferred, and now agree that it is in the best interest of economic and judicial efficiency to continue the expert witness disclosure dates by five (5) months, until after mediation can be completed and summary judgment can be decided.

8. WHEREAS, the Parties further agree that good cause exists to continue the expert witness disclosure deadlines, as a continuance is needed to prevent the expenditure of time and resources on experts that may not be needed for trial.

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NOW THEREFORE, the Parties he	ereto stipulate and agree that the Court may enter an Orde
continuing the July 28, 2017 and August 31,	2017 expert witness disclosure deadlines as follows:
Initial expert disclosure:	December 22, 2017
Rebuttal expert disclosure:	January 22, 2018
Expert discovery cut-off:	February 19, 2018
IT IS SO STIPULATED, THROU	GH COUNSEL OF RECORD.
DATED: February 16, 2017	LAW OFFICES OF LINH T. NGUYEN
	By: /s/ Linh T. Nguyen [as authorized on 2/16/2017] Linh T. Nguyen
	Attorneys for Plaintiff JOSE ARANDA
DATED: February 16, 2017	SEYFARTH SHAW LLP
	By: /s/ Pamela L. Vartabedian
	Nick C. Geannacopulos Ari Hersher Pamela L. Vartabedian
	Attorneys for Defendant
	AMERICAN PASTEURIZATION COMPANY, LLC
ΑΤΤΕΩΤΑΤΙΩΝ	N PURSUANT TO LOCAL RULE 131
	a Vartabedian, hereby attest that the content of this
	•
	Counsel for Plaintiff Jose Aranda, and that I have obtaine
Mr. Nguyen's authorization to affix his elect	
Executed this 16th day of February 2	
	/s/ <i>Pamela L. Vartabedian</i> Pamela L. Vartabedian
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STIPULATION AND [PROPOSED] ORDER TO N 37050877v.1	MODIFY SCHEDULING ORDER / CASE NO. 2:16-CV-02242-WBS-AC

The expert witness disclosure deadlines will be continued as follows:		
Initial expert disclosure:	December 22, 2017	
Rebuttal expert disclosure:	January 22, 2018	
Expert discovery cut-off:	February 19, 2018	
Dated: February 21, 2017	A1 -	
	Allison Clane	
	UNITED STATES MAGISTRATE JUDGE	
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