

1 WILLIAM L. BOWEN, SBN 229938  
 BOWEN & NGUYEN, LLP  
 2 2540 Douglas Blvd., Suite 200  
 Roseville, CA 95661  
 3 Telephone: 916.742.2220  
 Facsimile: 916.288.9858  
 4 [Bill@BowenNguyen.com](mailto:Bill@BowenNguyen.com)

5 Attorneys for Plaintiff SHANNON COUSINS KAMARA

6 MICHAEL G. PEDHIRNEY, Bar No. 233164  
 LITTLER MENDELSON, P.C.  
 7 333 Bush Street, 34<sup>th</sup> Floor  
 San Francisco, CA 94104  
 8 Telephone: 415.433.1940  
 mpedhirney@littler.com

9 JOHN H. ADAMS, JR., Bar No. 253341  
 10 LITTLER MENDELSON, P.C.  
 500 Capitol Mall  
 11 Suite 2000  
 Sacramento, CA 95814  
 12 Telephone: 916.830.7200  
 jhadams@littler.com

13 Attorneys for Defendant  
 14 ADAMS & ASSOCIATES, INC.

15  
 16 UNITED STATES DISTRICT COURT  
 17 EASTERN DISTRICT OF CALIFORNIA

18 SHANNON COUSINS KAMARA,  
 19 Plaintiff,  
 20 v.  
 21 ADAMS & ASSOCIATES, INC.,  
 22 Defendant.

Case No. 2:16-cv-02300-TLN-KJN

**JOINT STIPULATION AND ORDER TO  
 CONTINUE THE NON-EXPERT  
 DISCOVERY CUTOFF**

1 Plaintiff Shannon Cousins Kamara (“Plaintiff”) and Defendant Adams & Associates,  
2 Inc. (“Defendant”) (collectively, Plaintiff and Defendant are referred to as the “Parties”), by and  
3 through their respective counsel of record, hereby stipulate to extend the September 27, 2019, non-  
4 expert discovery cutoff by 60 days, until November 26, 2019. In support of this stipulation, the  
5 parties offer the following:

6 1. The Parties are engaged in settlement discussions and believe that additional  
7 time to complete written discovery and depositions will aid their attempts to resolve this matter  
8 without further litigation. The Parties wish to put on hold certain items of discovery while they  
9 engage in a good-faith attempt at reaching settlement, and additional time to complete discovery  
10 should the matter not resolve will aid the Parties in engaging in meaningful settlement discussions.

11 2. The extension of the non-expert discovery cutoff will not affect any other  
12 deadlines, including the deadline to disclose expert witnesses and for hearing on dispositive motions.

13 **THEREFORE**, subject to the approval of this Court, it is hereby stipulated and  
14 agreed that the cutoff for non-expert discovery be extended by 60 days, making the new deadline  
15 November 26, 2019.

16 **IT IS SO STIPULATED.**

17 Dated: September 23, 2019

18  
19 /s/ William L. Bowen (as authorized on 9/23/19)  
20 WILLIAM L. BOWEN  
21 BOWEN & NGUYEN, LLP  
22 Attorneys for Plaintiff  
23 SHANNON COUSINS KAMARA

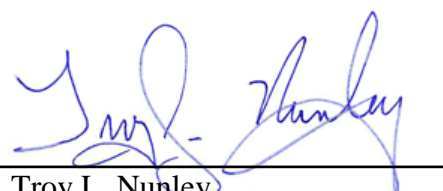
24 Dated: September 23, 2019

25 /s/ John H. Adams, Jr.  
26 MICHAEL G. PEDHIRNEY  
27 JOHN H. ADAMS, JR.  
28 LITTLER MENDELSON, P.C.  
Attorneys for Defendant  
ADAMS & ASSOCIATES, INC.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**IT IS SO ORDERED.**

Dated: September 24, 2019



Troy L. Nunley  
United States District Judge