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7
 8 UNITED STATES DISTRICT COURT
 9 EASTERN DISTRICT OF CALIFORNIA

10 MANISHA PALLA,
 11 Plaintiff,

12 v.

13 L M SPORTS, INC. dba LAKESIDE
 MARINA and dba ACTION
 14 WATERSPORTS OF TAHOE; L T
 LEASING, INC.; PAUL GARCIA; and
 15 DOES 1 through 50, inclusive,
 16 Defendants.

Case No.: 2:16-CV-02865-JAM-EFB

**STIPULATION TO EXTEND LADDER
 INTERLOCK EXPERT DISCOVERY;
 ORDER THEREON**

17
 18 AND RELATED ACTIONS
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1 Pursuant to Eastern District Local Rule 143, Plaintiff MANISHA PALLA, Defendants/
2 Third Party Plaintiffs LT LEASING, INC.; LM SPORTS, INC. dba LAKESIDE MARINA and
3 dba ACTION WATERSPORTS, LM SPORTS, INC. dba ACTION WATERSPORTS OF LAKE
4 TAHOE and DBA ACTION WATERSPORTS AT LAKE TAHOE, hereby stipulate:

5 1. The Order issued by Hon. John A. Mendez on August 22, 2018 (Doc. No. 102)
6 sets forth that discovery is ordered reopened for 90 days from the August 7, 2018 hearing date for
7 the purpose of allowing Rental Defendants only to locate and designate an additional expert on
8 the latter interlock issue, and for Plaintiff and Claimant Manisha Palla to respond to said
9 designation/disclosure by a response from only one of her experts.

10 2. The parties hereto stipulate to extend the time by which Counsel for Manisha Palla
11 may take the deposition of the Rental Defendants' expert from November 5, 2018 to **November**
12 **9, 2018**. The grounds for the parties' stipulation to extend these dates are as follows:

13 WHEREAS, Rental Defendants' expert is available for deposition on November 7,
14 2018, which is outside of the originally ordered ladder interlock discovery cut-off
15 date of November 5, 2018.

16 3. This is the first stipulation for an extension of time to complete the ladder interlock
17 discovery, and no parties to this action will be prejudiced by this stipulation.

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IT IS HEREBY STIPULATED AND AGREED, by and between counsel for the parties, and each of them, that the ladder interlock expert discovery be extended from November 5, 2018 to **November 9, 2018** so that Counsel for Manisha Palla may take the deposition of the Rental Defendants' expert.

DATED: October 25, 2018

KERSHAW COOK & TALLEY, PC

By: /s/ Anthony J. Garilli
Anthony J. Garilli, Esq.,
Counsel for Plaintiff MANISHA PALLA

DATED: October 25, 2018

HINSHAW & CULBERTSON, LLP

By: /s/ Forrest Booth
Forrest Booth, Esq.,
Counsel for Defendants, Plaintiffs-in
Limitation, Cross-Claimants and Third-Party
Claimants, LT LEASING, INC.; LM
SPORTS, INC. dba LAKESIDE MARINA
and dba ACTION WATERSPORTS and dba
ACTION WATERSPORTS OF LAKE
TAHOE and dba ACTION WATERSPORTS
AT LAKE TAHOE.

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ORDER

IT IS SO ORDERED, that the ladder interlock discovery cut-off be extended from November 5, 2018 to November 9, 2018.

DATED: 10/25/2018

/s/ John A. Mendez
JOHN A. MENDEZ,
United States District Court Judge