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6 *Attorneys for Plaintiff*

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 CONTINUE TRIAL
 DATE AND TRIAL-RELATED
 DEADLINES; ORDER THEREON**

17 IN THE MATTER OF THE COMPLAINT
 OF LT LEASING, INC.; LM SPORTS, INC.
 18 dba LAKESIDE MARINA and dba ACTION
 WATERSPORTS AT LAKE TAHOE and
 19 dba ACTION WATERSPORTS; TAMARA
 HASSETT, individually; and ROBERT
 20 HASSETT, individually,

21 LT LEASING, INC.; LM SPORTS, INC. dba
 LAKESIDE MARINA and dba ACTION
 22 WATERSPORTS and dba ACTION
 WATERSPORTS OF LAKE TAHOE and
 23 dba ACTION WATERSPORTS AT LAKE
 TAHOE; TAMARA HASSETT, individually;
 24 and ROBERT HASSETT, individually,

25 Cross-Claimants,

26 v.

27 PAUL GARCIA,
 28 Cross-Defendant.

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, Third Party Plaintiffs
5 TAMARA HASSETT, individually, and ROBERT HASSETT, individually, Defendant PAUL
6 GARCIA, Cross-Defendants SEAN O'DEA, NICHOLAS CARSCADDEN, and Cross-
7 Defendant/ Cross-Claimant REGAN ROBERTS, hereby stipulate:

8 1. The Pre-Trial Scheduling Order issued by Hon. John A. Mendez on February 10,
9 2017 sets forth that the jury trial in this matter is set for June 25, 2018. The grounds for the
10 parties' stipulation to continue the trial date and trial-related deadlines are as follows:

11 WHEREAS, Cross-Defendant/ Cross-Claimant REGAN ROBERTS only just filed
12 her Answer to the Complaint on October 23, 2017;

13 WHEREAS, Cross-Defendant NICHOLAS CARSCADDEN only just filed his
14 Answer to the Complaint on October 23, 2017;

15 WHEREAS, Cross-Defendant EVAN BOTWIN has not filed an Answer to the
16 Complaint to-date and Cross-Defendant EFE OZYURT must be served via The
17 Hague Convention, therefore this matter is not presently at-issue;

18 WHEREAS, the parties hereto are presently conducting written non-expert fact
19 discovery;

20 WHEREAS, Counsel for Plaintiff MANISHA PALLA is scheduled to take the
21 depositions of ROBERT HASSETT and employee Mathon Foss on December 4
22 and 5, 2017, the deposition of SEAN O'DEA on December 21, 2017, and the
23 deposition of Julia Hontos on January 22, 2018;

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WHEREAS, it is premature to disclose expert witness information and reports before such time as all parties have appeared and the appropriate fact discovery and depositions have been completed. Absent a continuance of the trial and trial-related deadlines, the expert witnesses will not be in possession of the information necessary to prepare meaningful reports in advance of the presently scheduled expert disclosure date.

2. The parties hereto have agreed and stipulate to continue the jury trial date to **October 29, 2018 at 9:00 a.m.** The Pre-Trial Conference shall take place on **September 7, 2018 at 10:00 a.m.** The trial-related deadlines shall be extended as follows:

- Discovery Cut-Off: May 7, 2018**
- Disclosure of Experts: March 12, 2018**
- Supplemental Disclosure of Experts: March 26, 2018**
- Dispositive Motions Deadline: June 25, 2018**
- Motions Hearing Date: July 24, 2018 at 1:30 p.m.**

3. This is the first stipulation for a continuance of the trial and trial-related deadlines, and no parties to this action will be prejudiced by this stipulation.

IT IS HEREBY STIPULATED AND AGREED, by and between counsel for the parties, and each of them, that the trial date, pre-trial conference date and trial-related deadlines shall be continued and extended as set forth hereinabove.

DATED: November 20, 2017

KERSHAW COOK & TALLEY, PC

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

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1 DATED: November 20, 2017

COGSWELL NAKAZAWA & CHANG

2 By: /s/ Dena Aghabeg
3 Dena Aghabeg, Esq.,
4 Counsel for Defendants, Plaintiffs-in
5 Limitation, Cross-Claimants and Third-Party
6 Claimants, LT LEASING, INC.; LM
7 SPORTS, INC. dba LAKESIDE MARINA
8 and dba ACTION WATERSPORTS and dba
9 ACTION WATERSPORTS OF LAKE
10 TAHOE and dba ACTION WATERSPORTS
11 AT LAKE TAHOE; TAMARA HASSETT,
12 and ROBERT HASSETT

8 DATED: November 20, 2017

GUICHARD TENG & PORTELLO

9 By: /s/ William Portello
10 William Portello, Esq.,
11 Counsel for Defendant and Cross-Defendant,
12 PAUL GARCIA

12 DATED: November 20, 2017

WOOD SMITH HENNING & BERMAN

13 By: /s/ Edward Baldwin
14 Edward Baldwin, Esq.
15 Counsel for Defendant and Cross-Defendant
16 SEAN O'DEA

16 DATED: November 20, 2017

CLARK HILL, LLP

17 By: /s/ Dean Olson
18 Dean Olson, Esq.,
19 Counsel for Cross-Defendant, NICHOLAS
20 CARSCADDEN

20 DATED: November 20, 2017

LAURIA TOKUNAGA GATES & LINN, LLP

21 By: /s/ Brian Rosenthal
22 Brian Rosenthal, Esq.,
23 Counsel for Cross-Defendant/ Cross-
24 Claimant, REGAN ROBERTS

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ORDER

IT IS SO ORDERED, that the jury trial date in this matter has been continued to **October 29, 2018 at 9:00 a.m.** The Pre-Trial Conference shall take place on **September 7, 2018 at 10:00 a.m.** The trial-related deadlines shall be extended as follows:

Discovery Cut-Off:	May 7, 2018
Disclosure of Experts:	March 12, 2018
Supplemental Disclosure of Experts:	March 26, 2018
Dispositive Motions Deadline:	June 25, 2018
Motions Hearing Date:	July 24, 2018 at 1:30 p.m.

DATED: November 21, 2017

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