

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

5 Attorneys for Plaintiff KEVIN BESS

6 MICHAEL G. PEDHIRNEY, Bar No. 233164
 LITTLER MENDELSON, P.C.
 7 333 Bush Street, 34th 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 KEVIN BESS,
 19 Plaintiff,
 20 v.
 21 ADAMS & ASSOCIATES, INC.,
 22 Defendant.

Case No. 2:17-cv-00173-TLN-KJN

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

1 Plaintiff Kevin Bess (“Plaintiff”) and Defendant Adams & Associates, Inc.
2 (“Defendant”) (collectively, Plaintiff and Defendant are referred to as the “Parties”), by and through
3 their respective counsel of record, hereby stipulate to extend the November 8, 2019, non-expert
4 discovery cutoff by 60 days, until January 7, 2020. In support of this stipulation, the parties offer the
5 following:

6 1. The Parties believe that the current fact discovery cutoff does not allow
7 enough time to complete the discovery that the Parties anticipate they will need.

8 2. The Parties believe they require a limited extension of time to complete
9 discovery and depositions without affecting any other deadline established by the Court.

10 3. Having reviewed the respective schedules of counsel, the Parties believe that
11 an extension of the fact discovery cutoff from November 8, 2019, to January 7, 2020, would allow
12 the parties sufficient time to complete fact discovery without affecting any other deadlines.

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 January 7, 2020.

16 **IT IS SO STIPULATED.**

17 Dated: October 11, 2019

18
19 /s/ William L. Bowen (as authorized on 10.11.19)
20 WILLIAM L. BOWEN
21 BOWEN & NGUYEN, LLP
22 Attorneys for Plaintiff
23 KEVIN BESS

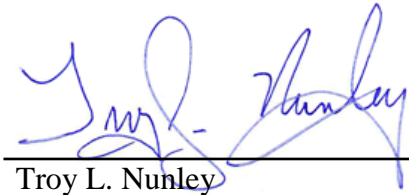
24 Dated: October 11, 2019

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: October 15, 2019



Troy L. Nunley
United States District Judge