1	WILLIAM L. BOWEN, SBN. 229938			
2	BOWEN LAW FIRM 2540 Douglas Blvd., Suite 200			
3	Roseville, CA 95661 Tel: (916) 742-2220			
4	Fax: (916) 288-9858 wlb@bowenlegal.com			
5	Attorneys for Plaintiff, KEVIN BESS			
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8	UNITED STATES DISTRICT COURT			
9	EASTERN DISTRICT OF CALIFORNIA			
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11	KEVIN BESS,	) Case No.: 2:17-cv-00173-TLN-KJN		
12	Plaintiff,	) ) STIPULATION AND ORDER TO CONTINUE ) THE DEPLOD FOR DISCOVERY AND TO		
13	v.	<ul> <li>) THE PERIOD FOR DISCOVERY AND TO</li> <li>) CONTINUE EXPERT DISCLOSURE AND</li> </ul>		
14	ADAMS & ASSOCIATES, INC., a Nevada	) <b>DISPOSITIVE MOTION DEADLINES</b>		
15	corporation; and DOES 1 to 25 inclusive,	)		
16	Defendant.	) ))		
17		) )		
18				
19	Plaintiff Kevin Bess ("Plaintiff") and De	fendant Adams & Associates, Inc. ("Defendant")		

Plaintiff Kevin Bess ("Plaintiff") and Defendant Adams & Associates, Inc. ("Defendant") (collectively "Parties"), by and through their respective counsel of record, hereby stipulate to extend the non-expert discovery cutoff by 90 days, from January 7, 2020 to April 6, 2020, as well as the expert disclosure deadline and last day to hear dispositive motions. This is a second request by the parties to extend discovery, as the initial order from the court contained a discovery cutoff of November 8, 2019. This is the first request of the Parties to continue other deadlines in this action. In support of this stipulation, the Parties offer the following:

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

STIPULATION AND ORDER TO CONTINUE DISCOVERY CUTOFF

2. The deposition of Plaintiff Bess has been partially completed and by agreement of the
Parties will be completed at a date to be agreed upon. Upon completion of Plaintiff's deposition, the
Parties will schedule the deposition of Defendant's Person Most Knowledgeable.

3. The Parties believe they require a limited extension of time to complete discovery and depositions and, out of an abundance of caution, wish to continue the deadline for disclosure of expert witnesses and the last day to hear dispositive motions. The current expert disclosure deadline is January 9, 2020, and the current last day to hear dispositive motions is May 14, 2020. There is no trial currently date set in this action.

4. Having reviewed the respective schedules of counsel, the Parties believe that an extension of the fact discovery cutoff from January 7, 2020, to April 6, 2020, would allow the Parties sufficient time to complete fact discovery. The Parties also believe that a continuance of the expert disclosure deadline from January 9, 2020, to April 16, 2020, and a continuance of the last day to hear dispositive motions from May 14, 2020, to August 14, 2020, would allow for completion of all discovery and the filing of dispositive motions, should such be determined to be necessary, without undue delay of this matter.

**THEREFORE**, the Parties stipulate and agree, subject to approval by the Court, that the cutoff for non-expert discovery be extended to April 6, 2020; that the expert witness disclosure deadline be extended to April 16, 2020; and the last day to hear dispositive motions be continued to August 14, 2020.

IT IS SO STIPULATED.

Dated: January 3, 2020

21 22 23		By:	<u>/s/ William L. Bowen</u> WILLIAM L. BOWEN BOWEN LAW FIRM Attorney for Plaintiff, KEVIN BESS
24	Dated: January 3, 2020	By:	_/s/ John H. Adams, Jr
25		29.	MICHAEL G. PEDHIRNEY JOHN H. ADAMS, JR.
26			LITTLER MENDELSON, P.C. Attorney for Defendant,
27			ADAMS & ASSOCIATES, INC.
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	STIPULATION AND ORDER 7	FO CO	NTINUE DISCOVERY CUTOFF

1			
2	ORDER		
3			
4	IT IS HEREBY ORDERED that the cutoff for non-expert discovery is extended to April 6,		
5	2020; the expert witness disclosure deadline is extended to April 16, 2020; and the last day to hear		
6	dispositive motions is continued to August 20, 2020.		
7 8	Dated: January 6, 2020		
9	my - tunter		
10 11	Troy L. Nunley United States District Judge		
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	STIPULATION AND ORDER TO CONTINUE DISCOVERY CUTOFF		