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 ADAMS & ASSOCIATES, INC.

12 **UNITED STATES DISTRICT COURT**  
 13 **EASTERN DISTRICT OF CALIFORNIA**

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

15 KEVIN BESS,

16 Plaintiff,

17 v.

18 ADAMS & ASSOCIATES, INC., a Nevada

19 corporation; and DOES 1 to 25 inclusive,

20 Defendant.

21 **STIPULATION AND ORDER TO CONTINUE**  
 22 **THE PERIOD FOR DISCOVERY AND TO**  
 23 **CONTINUE EXPERT DISCLOSURE AND**  
 24 **DISPOSITIVE MOTION DEADLINES**

1 Plaintiff Kevin Bess (“Plaintiff”) and Defendant Adams & Associates, Inc. (“Defendant”)  
2 (collectively “Parties”), by and through their respective counsel of record, hereby stipulate to extend the  
3 non-expert discovery cutoff from April 6, 2020, to July 27, 2020, as well as the expert disclosure deadline  
4 and last day to hear dispositive motions. This is the third request by the parties to extend discovery, as  
5 the initial order from the court contained a discovery cutoff of November 8, 2019. This is the second  
6 request of the Parties to continue other deadlines in this action. In support of this stipulation, the Parties  
7 offer the following:

8 1. The Parties were set to complete the outstanding depositions before the current discovery  
9 cutoff but jointly decided to postpone further discovery due to concerns regarding travel and gathering in  
10 light of the COVID-19 pandemic and the State of California’s Stay at Home order.

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

15 3. Having reviewed the respective schedules of counsel, the Parties believe that an  
16 extension of the fact discovery cutoff from April 6, 2020, to July 27, 2020, would allow the Parties  
17 sufficient time to complete fact discovery once the current Stay at Home order is lifted. The Parties also  
18 believe that a continuance of the expert disclosure deadline from April 16, 2020, to August 7, 2020, and  
19 a continuance of the last day to hear dispositive motions from August 14, 2020, to December 29, 2020,  
20 would allow for completion of all discovery and the filing of dispositive motions, should such be  
21 determined to be necessary, without undue delay of this matter.

22 **THEREFORE**, the Parties stipulate and agree, subject to approval by the Court, that the cutoff  
23 for non-expert discovery be extended to July 27, 2020; that the expert witness disclosure deadline be  
24 extended to August 7, 2020; and the last day to hear dispositive motions be continued to December 29,  
25 2020.

