

WILLIAM L. BOWEN, SBN. 229938
 BOWEN LAW FIRM
 2540 Douglas Blvd., Suite 200
 Roseville, CA 95661
 Tel: (916) 742-2220
 Fax: (916) 288-9858
 wlb@bowenlegal.com

Attorneys for Plaintiff,
 KEVIN BESS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

KEVIN BESS,)	Case No.: 2:17-cv-00173-TLN-KJN
)	
Plaintiff,)	
)	JOINT STIPULATION AND ORDER TO
v.)	CONTINUE THE PERIOD FOR DISCOVERY
)	BEYOND THE INITIAL CUTOFF
ADAMS & ASSOCIATES, INC., a Nevada)	
corporation; and DOES 1 to 25 inclusive,)	
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 July 27, 2020 to October 26, 2020. The parties further request that the expert witness disclosure deadline be extended from August 7, 2020 to November 6, 2020 and that the last day to hear dispositive motions is continued to April 8, 2021. The parties have made prior requests to continue discovery based on issues with the availability of witnesses and other issues. This request is made in light of the Covid-19 pandemic and technical issues which arose with attempts by the parties to complete the depositions of the parties. All Parties hereby confirm that they have met and conferred through-out the discovery process and continue to work to complete discovery in a timely and reasonably safe manner. In support of this stipulation, the parties offer the following:

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

3 2. The Parties have met and conferred in good faith to complete fact discovery before the
4 current pending deadline of July 27, 2020. However, the Covid-19 pandemic and technical issues with
5 setting remote depositions have created a series of delays beyond the control of the parties or their
6 counsel.

7 3. The Parties recognize that they have previously requested an extension of discovery
8 deadlines in this matter, but they believe that a further extension is necessary to complete discovery in a
9 manner that believe they require a limited extension of time to complete discovery and depositions
10 without affecting any other deadline established by the Court.

11 4. Having reviewed the respective schedules of counsel, the Parties believe that an
12 extension of the fact discovery cutoff by 90 days would allow the parties sufficient time to complete fact
13 discovery without prejudicing the rights of either party.

14 **THEREFORE**, the Parties stipulate and agree, subject to approval by the Court, that the cutoff
15 for non-expert discovery be extended by 90 days, making the new deadline October 26, 2020. The parties
16 further request that the deadline for expert witness disclosure be extended to November 6, 2020 and the
17 last day to hear dispositive motions is continued to April 8, 2021

18 **IT IS SO STIPULATED.**

19 Dated: July 20, 2020

20 By: /s/ William L. Bowen
21 WILLIAM L. BOWEN
22 BOWEN LAW FIRM
23 Attorney for Plaintiff,
24 KEVIN BESS

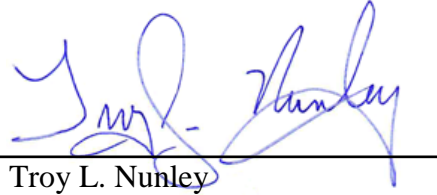
25 Dated: July 20, 2020

26 By: /s/ John H. Adams, Jr.
27 MICHAEL G. PEDHIRNEY
28 JOHN H. ADAMS, JR.
 LITTLER MENDELSON, P.C.
 Attorney for Defendant,
 ADAMS & ASSOCIATES, INC.

ORDER

IT IS HEREBY ORDERED that the cutoff for non-expert discovery is extended to **October 26, 2020**; the expert witness disclosure deadline is extended to **November 6, 2020**; and the last day to hear dispositive motions is continued to **April 15, 2021**.

Dated: July 24, 2020



Troy L. Nunley
United States District Judge