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 RANDSTAD GENERAL PARTNER (US),  
 10 LLC

11  
 12 UNITED STATES DISTRICT COURT  
 13 EASTERN DISTRICT OF CALIFORNIA  
 14

15 OLGA AVTENIEVA,  
 16 Plaintiff,  
 17 v.  
 18 RANDSTAD GENERAL PARTNER, (US) LLC,  
 a Delaware Limited Liability Company, SHARI'S  
 19 BERRIES, INC., a California Corporation, and  
 Does 1 through 20, inclusive,  
 20 Defendant.  
 21

Case No. 2:17-CV-00417-TLN-CKD  
**STIPULATION TO EXTEND  
 DISCOVERY CUTOFF; ORDER**  
**Judge Troy L. Nunley  
 Magistrate Judge Carolyn K. Delaney**

22 Plaintiff OLGA AVTENIEVA (“Plaintiff”) and Defendant RANDSTAD GENERAL  
 23 PARTNER (US), LLC (“Defendant”), by and through their counsel, subject to the court’s  
 24 approval, hereby stipulate as follows:

- 25 1. The First Amended Complaint in this action was filed on January 27, 2017.
- 26 2. On May 3, 2017, the Court issued its Pre-Trial Scheduling Order and set a  
 27 discovery cut-off date of March 1, 2018, a dispositive motion deadline of September 6, 2018,  
 28

1 and a trial date of February 4, 2019.

2 3. Since May 3, 2017, the parties have engaged in written discovery and have  
3 scheduled several depositions including the depositions of Plaintiff, and Randstad employees  
4 Laurence Fouques and Emily Salerno for November and December 2017.

5 4. The parties also engaged in mediation through the Voluntary Dispute Resolution  
6 Program on August 16, 2017, but were not able to resolve this matter.

7 5. Due to the upcoming maternity leave of Defendant's counsel Sumithra R.  
8 Roberts, Esq., and the schedule of Defendant's counsel Lindsay L. Fitch, and the constraints on  
9 scheduling the depositions of at least five additional witnesses around the country, the parties  
10 wish to extend the discovery cutoff to June 15, 2018. Because this new cutoff falls three  
11 months before the dispositive motion deadline, the parties do not believe this extension will  
12 force a change in any other scheduled dates, including the trial date.

13 NOW, THEREFORE, SUBJECT TO THE COURT'S APPROVAL, THE PARTIES AGREE  
14 AS FOLLOWS:

15 1. The deadline for completion of discovery only shall be extended to June 15, 2018.

16 IT IS SO STIPULATED.

17 Dated: November 22, 2017

BRYANT WHITTEN, LLP

18  
19 /s/ Shelley Bryant

Shelley Bryant, Esq.  
Attorneys for Plaintiff  
OLGA AVTENIEVA

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21  
22 Dated: November 22, 2017

SEYFARTH SHAW, LLP

23  
24 /s/ Lindsay S. Fitch

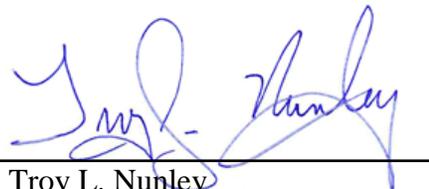
Lindsay S. Fitch, Esq.  
Sumithra R. Roberts, Esq.  
Attorneys for Defendant  
RANDSTAD GENERAL PARTNER (US), LLC

**ORDER**

The undersigned has considered and approves the Stipulation to Extend the Discovery Cutoff to  
June 15, 2018.

**IT IS SO ORDERED.**

DATED: November 27, 2017



Troy L. Nunley  
United States District Judge

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