

1 Alan J. Reinach, State Bar No. 196899  
 Email: ajreinach@churchstate.org  
 2 Jonathan Cherne, Esq.  
 Email: attorneycherne@gmail.com  
 3 CHURCH STATE COUNCIL  
 2686 Townsgate Road  
 4 Westlake Village, CA 91361  
 Telephone (805) 413-7398

5 Joseph E. Maloney, State Bar No. 95458  
 6 Email: joseph.maloney@jmaloneylaw.com  
 12005 Peregrine Way  
 7 Auburn, CA 95603  
 Telephone (530) 885-7787

8  
 9 Mark J. Jacobs, State Bar No. 208945  
 Email: mjacobs@fisherphillips.com  
 10 Christopher S. Alvarez, State Bar No. 294795  
 Email: calvarez@fisherphillips.com  
 11 FISHER & PHILLIPS LLP  
 621 Capitol Mall, Suite 1400  
 12 Sacramento, CA 95814  
 Telephone (916) 210-0400  
 13 Facsimile (916) 210-0401

14 Attorneys for Defendants  
 WEALTHCOUNSEL, LLC and INSPERITY, INC.

15  
 16 IN THE UNITED STATES DISTRICT COURT  
 17 FOR THE EASTERN DISTRICT OF CALIFORNIA

18 LAURIE NADEAU; ROBYN COFFIN; and  
 19 DAGNY MAGELSSSEN,

20 Plaintiffs,

21 v.

22 WEALTH COUNSEL, LLC; INSPERITY,  
 23 INC.,

24 Defendants.  
 25

Case No. 2:17-cv-00561-MCE-AC

**JOINT STIPULATION AND ORDER  
 REGARDING CONTINUANCE OF  
 DISCOVERY AND CASE DEADLINES**

Complaint Filed: March 15, 2017  
 FAC Filed: December 12, 2017  
 Trial Date: None Set



1           6.       Accordingly, the Parties respectfully request the Court continue the discovery  
2 completion date to May 15, 2019, so as to allow for the completion of depositions and written  
3 discovery and allow for any follow-up discovery that may be necessitated by the depositions.

4           7.       The Parties further respectfully request the Court modify its Initial Scheduling  
5 Order, ECF No. 3, subject to the Court's availability, to continue the following deadlines based  
6 on the continued discovery completion date of May 15, 2019:

7                 a.       Extend expert disclosures in accordance with Federal Rule of Civil  
8 Procedure 26(a)(2) to no later than sixty (60) days after the close of discovery;

9                 b.       Extend rebuttal expert disclosures in accordance with Federal Rule of  
10 Civil Procedure 26(a)(2) to no later than thirty (30) days after the designation of expert witnesses;

11                c.       Extend the deadline to file dispositive motions to no later than one  
12 hundred eighty (180) days after the close of non-expert discovery;

13                d.       Extend the deadline to file Joint Notice of Trial Readiness to no later than  
14 thirty (30) days after receive this Court's ruling(s) on the last filed dispositive motion(s); and

15                e.       Extend the deadline to file Joint Notice of Trial Readiness to no later than  
16 thirty (30) days after the close of the designation of supplemental expert witnesses if the Parties  
17 forgo the filing of dispositive motions.

18           8.       **GOOD CAUSE** exists for the stipulated continuance as follows:

19           9.       A continuance of the discovery completion date serves the interests of justice  
20 because the parties have not completed discovery, and continuing the discovery completion date  
21 will allow sufficient time for the parties to complete depositions and written discovery and  
22 conduct any follow up discovery.

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1           THEREFORE, the Parties hereby stipulate and agree to extend the aforementioned  
2 discovery deadlines as noted above.

3  
4 DATE: September 13, 2018

CHURCH STATE COUNCIL LLP

5  
6 By: /s/ Jonathon Cherne

7 Alan J. Reinach  
8 Jonathon Cherne

9 Attorneys for Plaintiffs  
LAURIE NADEAU; ROBYN COFFIN; and  
DAGNY MAGELSSSEN.

10 DATE: September 17, 2018

11 By: /s/ Joseph E. Maloney

12 Joseph E. Maloney

13 Attorneys for Plaintiffs  
14 LAURIE NADEAU; ROBYN COFFIN; and  
15 DAGNY MAGELSSSEN

16 DATE: September 19, 2018

FISHER & PHILLIPS LLP


17  
18 By: /s/ Christopher S. Alvarez

19 Mark J. Jacobs  
20 Christopher S. Alvarez

21 Attorneys for Defendants  
22 WEALTH COUNSEL, LLC and  
INSPERITY, INC.

23 IT IS SO ORDERED.

24  
25 Dated: September 20, 2018

26   
27 MORRISON C. ENGLAND, JR.  
28 UNITED STATES DISTRICT JUDGE