

Attorneys for Plaintiff SCARLETTE MEJIA  
on behalf of herself and similarly situated employees

SCARLETTE MEJIA, as an individual and on behalf of all others similarly situated,	)	<b>Case No. 2:17-CV-00570-TLN-KJN</b>
	)	
Plaintiffs,	)	<b><u>CLASS ACTION</u></b>
	)	
vs.	)	<b>STIPULATION AND ORDER</b>
	)	<b>REGARDING PRETRIAL SCHEDULING</b>
	)	<b>ORDER</b>
	)	
FARMLAND MUTUAL INSURANCE	)	
COMPANY, an Iowa corporation;	)	
FARMLAND MUTUAL INSURANCE CO,	)	
an unincorporated association; NATIONWIDE	)	
MUTUAL INSURANCE COMPANY, an	)	
Ohio corporation; and DOES 1 to 100,	)	
inclusive,	)	
	)	
	)	
Defendants.	)	

This Stipulation and proposed Order is entered into between Plaintiff SCARLETTE MEJIA (“Plaintiff”) and Defendants FARMLAND MUTUAL INSURANCE COMPANY, which was sued by its correct name and also as FARMLAND MUTUAL INSURANCE CO, and NATIONWIDE MUTUAL INSURANCE COMPANY (Hereinafter referred to as “Defendants”) (Plaintiff and Defendants all collectively, the “Parties”), by and through their counsel of record, as follows:

1 WHEREAS the Court issued a Pretrial Scheduling Order on May 19, 2017 [Dkt. No. 6] setting  
2 certain deadlines, including a factual discovery deadline of November 30, 2017, an expert witness  
3 disclosure deadline of December 28, 2017, and a filing deadline for Plaintiff's motion for class  
4 certification of February 22, 2018;

5 WHEREAS Plaintiff filed a First Amended Complaint in this matter on May 30, 2017;

6 WHEREAS Plaintiff served Requests for Admission, Set One, Special Interrogatories, Set One,  
7 and Request for Production of Documents, Set One on Defendants on June 9, 2017;

8 WHEREAS Defendants filed a motion to dismiss Plaintiff's claims and strike class allegations  
9 on June 29, 2017;

10 WHEREAS Defendants served responses to Plaintiff's discovery requests on July 27, 2017 after  
11 receiving a 30 day extension of time to respond to said discovery from Plaintiff's counsel;

12 WHEREAS, although Plaintiff believes the discovery responses are deficient and intends to meet  
13 and confer and file a motion to compel further responses, the Parties have agreed, in good faith, to defer  
14 this litigation effort and expense pending the Court's resolution of Defendants' motion to dismiss and  
15 strike class allegations, which may obviate the need to engage discovery motion practice; and

16 WHEREAS, to avoid any prejudice by delaying further meet and confer discussions and filing  
17 discovery motions, the Parties have agreed to request the Court to vacate the fact discovery, expert  
18 disclosure and certification motion filing deadlines currently set in the Courts May 19, 2017 Pretrial  
19 Scheduling Order [Dkt. No. 6];

20 IT IS HEREBY STIPULATED AND AGREED, by and between the Parties, subject to the  
21 approval of the Court, as follows:

22 1. The November 30, 2017 discovery deadline, the December 28, 2017 expert witness  
23 disclosure deadline, and the February 22, 2018 filing deadline for a motion for class certification shall be  
24 vacated;

25 2. That, if the Court denies Defendants' motion to dismiss and strike class allegations, the  
26 Parties shall meet and confer and submit new proposed deadlines for discovery, expert witness  
27 disclosures, and certification motion filing within 14 days thereafter for the Court's consideration;

3. The Court's May 19, 2017 Pretrial Scheduling Order [Dkt. No. 6] shall remain in effect in all other respects.

LITTLER MENDELSON, P.C.

DATED: August 16, 2017

By: /s/ Britney Torres  
Barbara A. Blackburn  
Britney N. Torres  
(As authorized on August 16, 2017)  
Attorneys for Defendants

SHIMODA LAW CORP.

DATED: August 16, 2017

By: /s/ Justin P. Rodriguez  
Galen T. Shimoda  
Justin P. Rodriguez  
Counsel for Plaintiff


## ORDER

The COURT, having considered the above stipulation, HEREBY ORDERS that:

1. The November 30, 2017 discovery deadline, the December 28, 2017 expert witness disclosure deadline, and the February 22, 2018 filing deadline for a motion for class certification is vacated;
2. If the Court denies Defendants' motion to dismiss and strike class allegations, the Parties shall meet and confer and submit new proposed deadlines for discovery, expert witness disclosures, and certification motion filing within 14 days thereafter for the Court's consideration;
3. The Court's May 19, 2017 Pretrial Scheduling Order [Dkt. No. 6] shall remain in effect in all other respects.

FOR GOOD CAUSE SHOWN, IT IS SO ORDERED.

DATED: August 17, 2017

  
Troy L. Nunley  
United States District Judge