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5 Attorneys for Defendants
 6 TARGET CORPORATION

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 9 IN THE UNITED STATES DISTRICT COURT
 10 EASTERN DISTRICT OF CALIFORNIA

11 VANESSA VAZQUEZ and SAMUEL
 VAZQUEZ
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 Plaintiff(s),
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 vs.
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 TARGET CORPORATION,
 15 MATTHEW WATSON and DOES 1
 through 10, inclusive,
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 Defendant(s).
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Case No. 2:17-cv-01106-JAM-AC

**STIPULATION FOR EXTENSION OF
 DEADLINES AND ORDER**

18 The parties have been attempting to coordinate and complete the depositions of plaintiffs
 19 and witnesses, but have been unable to complete the depositions due to multiple scheduling
 20 conflicts, including the unavailability of plaintiff’s counsel due to multiple trials.

21 These depositions of plaintiffs are now being coordinated for May 2018. Once the
 22 depositions are completed and additional medical records are obtained, the parties will need an
 23 opportunity to consider the issues and retain those experts necessary to respond to the damage
 24 issues resulting from the outcome of this information. Plaintiffs’ deposition testimony, as well as
 25 updated medical information is necessary for retained expert witnesses to provide a complete report
 26 for expert disclosures and to complete an independent medical evaluation of the plaintiff.

27 The current scheduling order deadlines do not allow sufficient time for the parties to
 28 complete the remaining discovery necessary following these depositions, adequately prepare expert

1 disclosures, and prepare for trial.

2 THEREFORE, it is hereby stipulated and agreed that the court’s Scheduling Order relative
3 to this matter shall be modified as follows:

- 4 1. All dispositive motions shall be filed by February 21, 2019. The hearing on such
5 motions shall be on March 29, 2019 at 1:30pm.
- 6 2. All discovery shall be completed by December 21, 2018.
- 7 3. The parties shall make expert witness disclosures under Fed. R. Civ. P. 26(a)(2) by
8 October 19, 2018. Supplemental disclosure and disclosure of any rebuttal experts under
9 Fed. R. Civ. P. 26(a)(2)(c) shall be made by November 13, 2018.
- 10 4. The final pre-trial conference shall be continued to April 26, 2019 at 10:00am
- 11 5. The jury trial in this matter shall be continued to June 10, 2019 at 9:00am

12 Dated: April 12, 2018

DRYER BABICH BUCCOLA WOOD
CAMPORA

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By: /s/ Christopher Wood
Christopher Wood, Esq.
Attorneys for Plaintiffs
VANESSA VAZQUEZ and SAMUEL
VAZQUEZ

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Dated: April 12, 2018

RIGGIO MORDAUNT & KELLY

By: /s/ Lori A. Reihl
Lori A. Reihl, Esq.
Attorneys for Defendant
TARGET CORPORATION

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ORDER (AS MODIFIED BY THE COURT)

Good cause having been shown,

IT IS HEREBY ORDERED that the parties to this matter that the court's Scheduling Order relative to this matter is modified as follows:

1. All dispositive motions shall be filed by February 19, 2019. The hearing on such motions shall be on March 19, 2019 at 1:30pm.
2. All discovery shall be completed by December 21, 2018.
3. The parties shall make expert witness disclosures under Fed. R. Civ. P. 26(a)(2) by October 19, 2018. Supplemental disclosure and disclosure of any rebuttal experts under Fed. R. Civ. P. 26(a)(2)(c) shall be made by November 13, 2018.
4. The final pre-trial conference shall be continued to April 26, 2019 at 10:00am
5. The jury trial in this matter shall be continued to June 10, 2019 at 9:00am.

DATED: 4/12/2018

/s/ John A. Mendez
Judge of the United States District Court