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5 TARGET CORPORATION

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8 UNITED STATES DISTRICT COURT  
9 EASTERN DISTRICT OF CALIFORNIA

10 VANESSA VAZQUEZ and SAMUEL  
11 VAZQUEZ

12 Plaintiff(s),

13 vs.

14 TARGET CORPORATION,  
MATTHEW WATSON and DOES 1  
15 through 10, inclusive,

16 Defendant(s).

Case No. 2:17-cv-01106-JAM-AC

**STIPULATION FOR EXTENSION OF  
DEADLINES AND ORDER**

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18 In this action plaintiff Vanessa Vazquez, alleges ongoing complaints and continuing  
19 treatment for back pain that she contends is related to the slip and fall incident at issue in this  
20 action. Plaintiff previously received a left sacroiliac joint injection in November 2018, which  
21 initially provided relief. However, she just recently returned in July 2019 reporting a return of her  
22 back pain. Since this visit was just recently completed, records are still being obtained. According  
23 to plaintiff, since she responded so well to injections for her left low back, her treating physician  
24 has recommended the same treatment for her right side. That injection was just recently completed.

25 The outcome of this additional injection will not be known for several months until it can be  
26 evaluated whether any relief persists or whether her pain complaints return. Based on this recent  
27 treatment, the parties stipulate and agree that an extension of the current discovery deadlines is  
28 warranted. With the current deadlines, the parties have insufficient time to obtain complete

1 medical records on this scheduled treatment, evaluate the outcome of the recent injection, and  
2 complete meaningful expert disclosures and discovery.

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

- 5 1. The deadline for expert witness disclosures under Fed. R. Civ. P. 26(a)(2) shall be  
6 extended from August 16, 2019 to June 5, 2020.
- 7 2. The deadline for supplemental disclosure and disclosure of any rebuttal experts under  
8 Fed. R. Civ. P. 26(a)(2)(c) shall be extended from September 17, 2019 to July 3, 2020.
- 9 3. The deadline to complete all discovery shall be extended from October 11, 2019 to  
10 August 21, 2020.
- 11 4. The deadline for all dispositive motions shall be extended from November 8, 2019 to  
12 June 5, 2020. The hearing on such motions shall be July 17, 2020 at 1:30pm.
- 13 5. The final pre-trial conference shall be continued from January 31, 2020 at 11:00am to  
14 August 28, 2020 at 11:00am. The joint pre-trial statement is now due August 21, 2020.
- 15 6. The jury trial in this matter shall be re-set from March 9, 2020 at 9:00am to October 5,  
16 2020 at 9:00am.

17  
18 Dated: 10/2/19

DRYER BABICH BUCCOLA WOOD  
CAMPORA

19  
20 By: /s/ Christopher Wood, Esq.  
21 Christopher Wood, Esq.  
22 Larry Phan, Esq.  
23 Attorneys for Plaintiffs  
VANESSA VAZQUEZ and SAMUEL  
VAZQUEZ

24 Dated: 10/1/19

RIGGIO MORDAUNT & KELLY

25  
26 By: /s/ Lori A. Reihl, Esq.  
27 Michael R. Mordaunt, Esq.  
28 Lori A. Reihl, Esq.  
Attorneys for Defendant  
TARGET CORPORATION

**ORDER (AS MODIFIED BY THE COURT)**

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*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. The deadline for expert witness disclosures under Fed. R. Civ. P. 26(a)(2) shall be June 5, 2020.
2. The deadline for supplemental disclosure and disclosure of any rebuttal experts under Fed. R. Civ. P. 26(a)(2)(c) shall be July 3, 2020.
3. The deadline to complete all discovery shall be August 21, 2020.
4. The deadline for all dispositive motions shall be **September 29, 2020**. The hearing on such motions shall be **October 27, 2020** at 1:30pm.
5. The final pre-trial conference shall be **December 11, 2020** at 11:00am. The joint pre-trial statement is now due **December 4, 2020**.
6. The jury trial in this matter shall be **January 11, 2021** at 9:00am.

DATED: October 8, 2019

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