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| 14   |  |  |
| 15   | UNITED STAT  | TES DISTRICT COURT                                 |
| 16   | EASTERN DISTRICT OF CALIFORNIA   |  |
| 17   |  |  |
| 18   | ROY GARCIA,  | Case No. 2:17-CV-01202-TLN-EFB                     |
| 19   | Plaintiff,   | STIPULATION EXTENDING<br>DISCOVERY DATES AND ORDER |
| 20   | v.   | Complaint Filed: February 23, 2017                 |
| 21   | KRATOS DEFENSE SOLUTIONS AND<br>DOES 1 THOROUGH 100, INCLUSIVE,            |  |
| 22   | Defendant.   |  |
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| 28<br>LITTLER MENDELSON, P.C.  |  |  |
| 500 Capitol Mall<br>Suite 2000<br>Sacramento, CA 95814<br>916.830.7200 |  | Case No. 2:17-CV-01202-TLN-EFB                     |

| 1  | Plaintiff Roy Garcia (hereinafter "Garcia" or "Plaintiff") and Defendant Kratos                        |  |
|--|--|--|
| 2  | Defense & Security Solutions, Inc. (hereinafter "Kratos" or "Defendant") by and through their          |  |
| 3  | respective counsel, have worked to accommodate each other regarding the scheduling of depositions      |  |
| 4  | in this matter. The current non-expert discovery cut-off in this matter is May 31, 2018; however, the  |  |
| 5  | Parties have agreed to allow the deposition of Eric Demarco (CEO for Defendant) to proceed on June     |  |
| 6  | 22, 2018.  |  |
| 7  | Additionally, Plaintiff served a Supplemental Request for Production of Documents,                     |  |
| 8  | Set 2, on Defendant, which requires Defendant to engage in e-discovery. The Parties are in the process |  |
| 9  | of meeting and conferring regarding the scope of the e-discovery. The Parties have agreed that         |  |
| 10   | Defendant's responses are due June 8, 2018, instead of May 24, 2018.                                   |  |
| 11   | Accordingly, the Parties hereby stipulate to extend discovery cut-off as it pertains only              |  |
| 12   | to Mr. Demarco's deposition and Defendant's responses to Plaintiff's Supplemental Request for          |  |
| 13   | Production of Documents, Set 2, to July 16, 2018 (allowing the Parties some additional time in case    |  |
| 14   | there are any other issues that arise that require the Parties to meet and confer).                    |  |
| 15   | IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.  |  |
| 16   | Dated: May 29, 2018, LITTLER MENDELSON, P.C.   |  |
| 17   | By: <u>:/s/ Barbara A. Blackburn</u><br>BARBARA A. BLACKBURN   |  |
| 18   | SIMERDIP KHANGURA  |  |
| 19   | Attorneys for Defendant<br>KRATOS DEFENSE SOLUTIONS  |  |
| 20   | Dated: May 29, 2018,LAW OFFICES OF BOWMAN & ASSOC.   |  |
| 21   | By: :/s/ Robert Bowman<br>ROBERT BOWMAN  |  |
| 22   | Attorneys for Defendant<br>KRATOS DEFENSE SOLUTIONS  |  |
| 23   | KRATOS DEFENSE SOLUTIONS   |  |
| 24   | PURSUANT TO STIPULATION, IT IS SO ORDERED.   |  |
| 25   | DATED: May 30, 2018  |  |
| 26   | - Wy - Hunter  |  |
| 27   | Troy L. Nunley<br>United States District Judge   |  |
| 28<br>LITTLER MENDELSON, P.C.  | Onice States District stage  |  |
| 500 Capitol Mall<br>Suite 2000<br>Sacramento, CA 95814<br>916.830.7200 | 2. Case No. 2:17-CV-01202-TLN-EFB  |  |