

1 Elizabeth A. Falcone CA Bar No. 219084  
 elizabeth.falcone@ogletree.com  
 2 Amanda C. Van Wieren, *admitted pro hac vice*  
 amanda.vanwieren@ogletree.com  
 3 OGLETREE, DEAKINS, NASH,  
 SMOAK & STEWART, P.C.  
 4 The KOIN Center  
 222 SW Columbia Street, Suite 1500  
 5 Portland, OR 97201  
 Telephone: 503.552.2140  
 6 Facsimile: 503.224.4518

7 Attorneys for Defendant  
 TARGET CORPORATION  
 8

9 T. James Fisher, CA Bar No. 64079  
 fisherlawoffice@sbcglobal.net  
 10 1721 Court Street  
 Redding, CA 96001  
 11 Telephone: 530.244.0909  
 Facsimile: 530.244.0923  
 12

13 Attorney For Plaintiff  
 LORRI BEAVER  
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15 **UNITED STATES DISTRICT COURT**  
 16 **EASTERN DISTRICT OF CALIFORNIA**

17 LORRI BEAVER,  
 18 Plaintiff,  
 19 v.  
 20 TARGET CORPORATION, AND  
 DOES 1 THROUGH 50,  
 21 Defendants.  
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Case No. 2:17-cv-01254-MCE-CMK  
**STIPULATION AND ORDER  
 EXTENDING PRETRIAL  
 DEADLINES**  
 Complaint Filed: April 25, 2017  
 Trial Date: Not Set  
 Judge: Hon. Morrison C. England, Jr.

17cv1254.so.0608.  
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1 Plaintiff Lorri Beaver (“Plaintiff”) and Defendant Target Corporation  
2 (“Defendant”), by and through their undersigned counsel of record, hereby  
3 stipulate to extend the pretrial deadlines set forth in the October 2, 2017 Stipulation  
4 and Order Regarding Discovery Plan (Dkt. 8), as follows:

- 5 • Close of non-expert discovery: from June 15, 2018, to **August 3,**
- 6 **2018;**
- 7 • Expert disclosures due: from August 14, 2018, to **October 2, 2018;**
- 8 and
- 9 • Rebuttal expert disclosures due: from September 13, 2018, to
- 10 **November 1, 2018.**

11 Pursuant to Local Rule 144(b), the parties certify that this is the first extension of  
12 deadlines sought with regard to the above-referenced deadlines.

13 This extension is being sought due to the unavailability of the Plaintiff’s  
14 counsel, who was in trial during the month of May in an unrelated matter and  
15 therefore unable to make himself available to confer on discovery disputes or  
16 attend depositions relevant to this case, and to allow Defendant’s new counsel,  
17 Elizabeth A. Falcone and Amanda C. Van Wieren of Ogletree, Deakins, Nash,  
18 Smoak & Stewart, P.C., whose substitution and appearance were approved by the  
19 Court on May 17, 2018, and May 23, 2018, respectively, sufficient time to  
20 familiarize themselves with the factual and procedural histories of these cases. *See*  
21 Dkt. Nos. 14 & 16. The extension requested herein will not prejudice any party or  
22 delay trial in this matter, as no extension of the dispositive motion deadline (now  
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1 set for **December 12, 2018**, *see* Dkt. 8), which deadline triggers the trial date in  
2 this matter (*see* Dkt. 3, at 5), is being sought. This request is made in good faith  
3 and not for the purpose of delay.

4 IT IS SO STIPULATED.

5 Respectfully submitted,

6 DATED: June 6, 2018 T. JAMES FISHER, ATTORNEY AT LAW  
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9 By: /s/ T. James Fisher (as authorized on 6/6/18)  
10 T. James Fisher

11 Attorney for Plaintiff  
12 LORRI BEAVER  
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14 DATED: June 6, 2018 OGLETREE, DEAKINS, NASH, SMOAK &  
15 STEWART, P.C.

16  
17 By: s/ Elizabeth A. Falcone  
18 Elizabeth A. Falcone  
19 Amanda C. Van Wieren

20 Attorneys for Defendant  
21 TARGET CORPORATION  
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ORDER


The Court, having reviewed the Stipulation of the Parties and finding good cause, hereby ORDERS that the deadlines set forth in the October 2, 2017 Stipulation and Order Regarding Discovery Plan (ECF No. 8) be extended as follows:

- Close of non-expert discovery: from June 15, 2018, to **August 3, 2018**;
- Expert disclosures due: from August 14, 2018, to **October 2, 2018**;
- and
- Rebuttal expert disclosures due: from September 13, 2018, to **November 1, 2018**.

The Court further orders that, notwithstanding the above, the close of expert discovery and the deadline for dispositive motions, **December 12, 2018**, shall continue to be effective. Additionally, consistent with the Court’s Initial Pretrial Scheduling Order (ECF No. 3) and Stipulation and Order Regarding Discovery Plan (ECF No. 8), the parties are ordered to file a Joint Notice of Trial Readiness not later than thirty (30) days after receiving this Court’s ruling(s) on the last filed dispositive motion, or if no dispositive motion is filed, by **November 30, 2018**.

IT IS SO ORDERED.

Dated: June 13, 2018

  
MORRISON C. ENGLAND, JR.  
UNITED STATES DISTRICT JUDGE