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8 TARGET CORPORATION

9 **UNITED STATES DISTRICT COURT**  
10 **EASTERN DISTRICT OF CALIFORNIA**

11 LORRI BEAVER,

12 Plaintiff,

13 vs.

14 TARGET CORPORATION, AND DOES 1  
15 THROUGH 50

16 Defendants.  
17

Case No. 17-cv-01254-MCE-CMK

**STIPULATION AND ORDER REGARDING  
DISCOVERY PLAN**

1 The Parties to the above-captioned action, Defendant TARGET CORPORATION  
2 (“Defendant”) and Plaintiff LORRI BEAVER (“Plaintiff”)(collectively, the “Parties”) by and  
3 through their attorneys of record, hereby stipulate and agree to the following discovery  
4 plan:

5 WHEREAS, pursuant to the Court’s Initial Pretrial Scheduling Order for this matter,  
6 the Parties met and conferred pursuant to Rule 26 of the Federal Rules of Civil Procedure  
7 to formulate a discovery plan;

8 WHEREAS, the parties agreed, pursuant to the terms of the Court’s Initial Pretrial  
9 Scheduling Order, that fact discovery must be completed by June 15, 2018, which is within  
10 one year of the date of removal;

11 WHEREAS, the parties agreed, pursuant to the terms of the Court’s Initial Pretrial  
12 Scheduling Order, that the expert disclosure deadline shall be August 14, 2018, which is  
13 within 60 days of the close of fact discovery;

14 WHEREAS, the parties stipulate, pursuant to the terms of the Court’s Initial Pretrial  
15 Scheduling Order, that supplemental expert disclosure deadline shall be September 13,  
16 2018, which is within 30 days of the initial expert designations; and

17 WHEREAS, the Parties have exchanged their initial disclosures;

18 THEREFORE, the parties stipulate that fact discovery must be completed by **June**  
19 **15, 2018;**

20 THEREFORE, the parties stipulate that the expert disclosure deadline shall be  
21 **August 14, 2018;** and

22 THEREFORE, the parties stipulate that the supplemental expert disclosure deadline  
23 shall be **September 13, 2018.**

1 Dated: September 28, 2017 CONSTANGY, BROOKS, SMITH & PROPHETE LLP

2  
3 By /s/ L. Julius M. Turman  
4 L. Julius M. Turman  
5 Philip J. Smith  
6 Attorneys for Defendant  
7 TARGET CORPORATION

8 Dated: September 28, 2017

9 By /s/ T. James Fisher (as authorized on 9/19/17)  
10 T. James Fisher  
11 Attorneys for Plaintiff  
12 LORRI BEAVER

13 **ORDER**

14 Pursuant to the parties' stipulation and the Court's Initial Pretrial Scheduling Order,  
15 ECF No. 3, fact discovery shall be completed by June 15, 2018; the deadline to disclose  
16 experts shall be August 14, 2018; and the supplemental expert disclosure deadline is  
17 September 13, 2018.

18 As also provided in the Initial Pretrial Scheduling Order, the parties are ordered to  
19 file a Joint Notice of Trial Readiness not later than thirty (30) days after receiving this  
20 Court's ruling(s) on the last filed dispositive motion(s). If the parties do not intend to file  
21 dispositive motions, the parties are ordered to file a Joint Notice of Trial Readiness not later  
22 than thirty (30) days after the close of the designation of supplemental expert witnesses  
23 and the notice must include statements of intent to forgo the filing of dispositive motions.  
24 The parties are directed to review the Initial Pretrial Scheduling Order, ECF No. 3, for  
25 additional information.

26 IT IS SO ORDERED.

27 Dated: September 29, 2017

28   
MORRISON C. ENGLAND, JR.  
UNITED STATES DISTRICT JUDGE