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

29 MCGRAW-HILL GLOBAL
30 EDUCATION HOLDINGS, LLC,
31 PEARSON EDUCATION, INC., and
32 CENGAGE LEARNING, INC.,

33 Plaintiff,

34 v.

35 YAROSLAV STOLYARCHUK,

36 Defendant.

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Attorneys for Defendant
YAROSLAV STOLYARCHUK

Case No. 2:17-cv-01716-WBS-DB

**JOINT STIPULATION AND CONSENT
[PROPOSED] SCHEDULING ORDER**

WHEREAS, Plaintiffs filed their Complaint on August 17, 2017 and their First Amended Complaint on April 12, 2018;

WHEREAS, on December 13, 2017, the Court entered a Status (Pretrial Scheduling) Order (ECF No. 10);

WHEREAS, discovery commenced in December 2017;

1 WHEREAS, the parties sought two previous modifications of the Scheduling Order: first,
2 because discovery moved more slowly than anticipated (ECF No. 20), and second, to allow the
3 parties to explore settlement discussions, without litigation deadlines impeding the possibility of
4 a settlement (ECF No. 24), both of which modifications the Court granted (ECF Nos. 22, 25);

5 WHEREAS, the parties have made progress in settlement discussions, but agree that
6 additional time is necessary to conclude such discussions, including, if the parties later agree,
7 through Local Rule 271's Voluntary Dispute Resolution Program; and

8 WHEREAS, this is the parties' third request for an extension of any deadline in the
9 Court's Pre-Trial Scheduling Order (ECF No. 10);

10 THE PARTIES JOINTLY CONSENT TO and request that the Court enter an Order
11 modifying certain dates in the Order Modifying the Pre-Trial Scheduling Order (ECF No. 25), as
12 follows:

13

	Old Date	New Date
14 Rule 26(a)(2) expert witness disclosures	October 31, 2018	January 7, 2019
15 Rebuttal expert witness reports	November 28, 2018	February 4, 2019
16 Completion of discovery	January 7, 2019	March 7, 2019
17 Deadline to file dispositive motions	February 4, 2019	April 4, 2019
18 Final pre-trial conference	May 13, 2019	July 15, 2019
19 Trial	July 16, 2019	September 16, 2019*

20 * or at the Court's earliest convenience thereafter.

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1 All other dates listed in the Pre-Trial Scheduling Order (ECF No. 10) shall remain in
2 place.

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4 Dated: October 12, 2018

Respectfully submitted,

SHADES OF GRAY LAW GROUP, P.C.
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9 /s/ Naomi Jane Gray

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10
11 ROPERS, MAJESKI, KOHN & BENTLEY

12
13 /s/ Kevin Isaacson (as authorized
on Oct. 12, 2018)

14 MICHAEL J. IOANNOU
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16 CLARK A. WALDON

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18 **IT IS SO ORDERED.** The dates are modified as follows:

- 19 1. Rule 26(a)(2) expert witness disclosures: January 7, 2019
20 2. Rebuttal expert witness reports: February 4, 2019
21 3. Completion of discovery: March 7, 2019
22 4. Deadline to file dispositive motions: April 4, 2019
23 5. Final pre-trial conference: July 22, 2019 at 1:30 p.m.
24 6. Jury Trial: September 17, 2019 at 9:00 a.m.

25 Dated: October 16, 2018

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27 WILLIAM B. SHUBB
28 UNITED STATES DISTRICT JUDGE