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DRAGADOS USA, INC. and  
12 LLOYD NEAL

13  
14 UNITED STATES DISTRICT COURT  
15 EASTERN DISTRICT OF CALIFORNIA  
16 SACRAMENTO DIVISION  
17

18 KOFI KYEI, an individual,  
19 Plaintiff,  
20 v.  
21 DRAGADOS USA, INC., a Delaware  
Corporation, LLOYD NEAL, an individual;  
22 and DOES 1 through 100, inclusive.  
23 Defendants.  
24

Case No. 2:17-CV-01875-WBS-CKD

**STIPULATION AND [~~PROPOSED~~]  
ORDER EXTENDING TIME TO  
COMPLETE DISCOVERY AND  
DISPOSITIVE MOTIONS**

25 Plaintiff Kofi Kyei (“Plaintiff”) and Defendants Dragados USA, Inc. and Lloyd Neal  
26 (“Defendants”) (collectively, “the Parties”), by and through their undersigned counsel, hereby  
27 stipulate and agree as follows:

28 ///

1 WHEREAS, counsel for Plaintiff, Mark Velez of The Velez Law Firm, PC, substituted  
2 into this case on or about October 30, 2018;

3 WHEREAS, the deposition of Plaintiff Kofi Kyei was postponed upon request from  
4 Plaintiff's former attorney of record because Plaintiff resides out of state and Plaintiff's former  
5 counsel wanted to attempt to resolve the matter through negotiation before incurring the expense  
6 of a deposition;

7 WHEREAS, counsel for Defendants agreed to the request of Plaintiff's counsel, but the  
8 parties were not able to resolve the matter;

9 WHEREAS, Plaintiff's new counsel of record needs additional time to complete  
10 necessary discovery and counsel for Defendants does not oppose such;

11 THEREFORE, the Parties stipulate and agree, through their respective counsel, that  
12 should the Court so approve, the Parties shall complete all discovery and shall file any dispositive  
13 motions by not later than January 31, 2019.

14 Dated: November 15, 2018

THE VELEZ LAW FIRM PC

15 By: /s/ Mark Velez [as authorized on 11.15.18]  
16 Mark Velez  
17 Attorneys for Plaintiff  
KOFI KYEI

18 Dated: November 21, 2018

JACKSON LEWIS P.C.

19 By: /s/ James T. Jones  
20 James T. Jones  
21 Attorneys for Defendants  
DRAGADOS USA, INC. and LLOYD NEAL

22 **ORDER**

23 Based upon the foregoing stipulation of the Parties, and good cause appearing therefor,

24 **IT IS HEREBY ORDERED:**

25 The Parties shall complete all discovery and shall file any dispositive motions by not later  
26 than January 31, 2019.

27 Dated: November 28, 2018



28 WILLIAM B. SHUBB  
UNITED STATES DISTRICT JUDGE