

DOWNEY BRAND LLP

1 DOWNEY BRAND LLP
 2 CASSANDRA M. FERRANNINI (Bar No. 204277)
 3 BRADLEY C. CARROLL (Bar No. 300658)
 4 621 Capitol Mall, 18th Floor
 5 Sacramento, CA 95814-4731
 Telephone: 916.444.1000
 Facsimile: 916.444.2100
 cferrannini@downeybrand.com
 kkonz@downeybrand.com

6 Attorneys for Defendant
 7 SIERRA NEVADA JOURNEYS

8 UNITED STATES DISTRICT COURT
 9 EASTERN DISTRICT OF CALIFORNIA

11 TIAMBRA HENNESSEY,

12 Plaintiff,

13 v.

14 SIERRA NEVADA JOURNEYS, A
 15 NEVADA CORPORATION, AND DOES
 1 THROUGH 100, INCLUSIVE,

16 Defendants.

Case No. 2:17-CV-02321-JAM-DB

**JOINT STIPULATION AND ORDER
 REGARDING DISCOVERY SCHEDULE**

Complaint Removed: November 6, 2017

STIPULATION

19 Plaintiff TIAMBRA HENNESSEY (“Plaintiff”) and Defendant SIERRA NEVADA
 20 JOURNEYS (“Defendant”) (collectively, “Parties”), by and through their respective attorneys of
 21 records, stipulate and agree as follows:

- 22 1. That the deadline to complete all discovery in this action was set at October 26,
 23 2018, by the Court’s scheduling order.
- 24 2. That the Parties wish to mediate their dispute in hopes of reaching a settlement of
 25 this action.
- 26 3. That the Parties have agreed to attend mediation on October 24, 2018.
- 27 4. That the Parties wish to avoid the continued expense of discovery, including
 28

1 depositions and expert discovery, pending their mediation.

2 5. That the Parties wish to extend the deadline to complete discovery to
3 accommodate their mediation.

4 6. That the deadline for completing discovery in this action should be moved to
5 November 29, 2018.

6 7. That the deadline for disclosure of expert witnesses should be moved to October
7 26, 2018, and the supplemental disclosure and disclosure of any rebuttal experts should be moved
8 to November 9, 2018.

9 IT IS SO STIPULATED.

11 DATED: August 22, 2018

DOWNEY BRAND LLP

13 By: /s/ Bradley C. Carroll
14 CASSANDRA M. FERRANNINI
15 BRADLEY C. CARROLL
16 Attorney for Defendant
17 SIERRA NEVADA JOURNEYS

17 DATED: August 22, 2018

OTKUPMAN LAW FIRM, ALC

19 By: /s/ Roman Otkupman (as authorized on 8/22/18)
20 ROMAN OTKUPMAN
21 Attorney for Plaintiff
22 TIAMBRA HENNESSEY

28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

ORDER

GOOD CAUSE APPEARING, it is hereby ORDERED that:

1. The deadline for Plaintiff and Defendant to completed discovery in this matter shall be moved from October 26, 2018, to November 29, 2018.

2. The deadline for Plaintiff and Defendant to disclose expert witnesses shall be moved to October 26, 2018, and the deadline for supplemental disclosure and disclosure of any rebuttal experts shall be moved to November 9, 2018

IT IS SO ORDERED.

DATED: 8/22/2018

/s/ John A. Mendez

United States District Court Judge