

1 Rob Hennig (SBN 174646)
rob@employmentattorneyla.com
2 Brandon Ruiz (SBN 264603)
brandon@employmentattorneyla.com
3 Dat Tommy Phan (SBN 316813)
dat@employmentattorneyla.com
4 HENNIG RUIZ & SINGH, P.C.
3600 Wilshire Blvd., Suite 1908
5 Los Angeles, CA 90010
Telephone: (213) 310-8301
6 Fax: (213) 310-8302

7 Attorneys for Plaintiff MATTHEW STONECYPHER

8
9 Michael D. Bruno (SBN 166805)
Joseph P. Breen (SBN 124330)
GORDON REES SCULLY MANSUKHANI, LLP
10 275 Battery Street, Suite 2000
San Francisco, CA 94111
11 Telephone: (415) 875-4242
Fax: (415) 986-8054
12 mbruno@grsm.com
jbreen@grsm.com

13 Attorneys for Defendant IASCO FLIGHT TRAINING, INC.

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15 UNITED STATES DISTRICT COURT
16 EASTERN DISTRICT OF CALIFORNIA
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18 MATTHEW STONECYPHER, an
19 individual,

20 Plaintiff,

21 v.

22 IASCO FLIGHT TRAINING INC., a
23 California corporation,

24 Defendant.

CASE NO. 2:17-cv-02409-MCE-JDP

**JOINT STIPULATION FOR FURTHER
LIMITED EXTENSION OF DISCOVERY
DEADLINE; ORDER THEREON**

Judge: Hon. Morrison C. England, Jr.

Courtroom: 7

Mag. Judge: Hon. Jeremy D. Peterson

Courtroom: 8

1 **IT IS HEREBY STIPULATED** by and between the Parties to *Matthew*
2 *Stonecypher v. IASCO Flight Training, Inc. et al.*, (“the Parties”) by and through their
3 respective counsel of record, to seek leave of court to further modify the Second
4 Supplemental Pre-trial Scheduling Order issued on June 1, 2020, [Document 40] (“the
5 Scheduling Order”) and briefly extend the existing discovery deadline of January 11,
6 2021, until February 9, 2021, based on the showing of good cause as follows:

7 WHEREAS, the Second Supplemental Pre-trial Scheduling Order ordered that all
8 fact discovery, with the exception of expert discovery, shall be completed no later than
9 November 16, 2020;

10 WHEREAS, the Court issued an Order on November 3, 2020, Document No. 60,
11 and granted the Parties an extension until January 11, 2021, to complete fact discovery,
12 with the exception of expert discovery;

13 WHEREAS, the Parties seek to complete their fact discovery and resolve certain
14 outstanding discovery issues that are now pending before Magistrate Judge Jeremy D.
15 Peterson pursuant to the Court’s orders issued on November 25, 2020, Document No.
16 65, and December 8, 2020, Document No. 67, respectively;

17 WHEREAS, a limited extension of the deadline beyond January 11, 2021, will
18 allow the Parties to resolve the outstanding discovery issues including the production of
19 certain documents by January 6, 2021, and the scheduling and completion of
20 depositions as agreed by the Parties concerning such documents; and

21 WHEREAS, the Parties anticipate an extension granted until February 9, 2021,
22 will allow sufficient time for the Parties to resolve the outstanding discovery issues
23 including the document production and completion of depositions referenced above, the
24 Parties respectfully request that the Court grant leave to modify the Scheduling Order as
25 stated below:

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IT IS SO STIPULATED. Respectfully submitted,

Dated: December 16, 2020

HENNIG RUIZ & SINGH, P.C.

By: /s/ Rob Henning

Rob Henning
Brandon Ruiz
Dat Tommy Phan

Attorneys for Plaintiff
MATTHEW STONECYPHER

Dated: December 16, 2020

GORDON REES SCULLY MANSUKHANI, LLP

By: /s/ Joseph Breen

Joseph Breen
Attorneys for Defendant
IASCO FLIGHT TRAINING, INC.

ORDER

In accordance with the foregoing stipulation, and good cause appearing, the Second Supplemental Pre-trial Scheduling Order shall be modified to allow all remaining fact discovery, with the exception of expert discovery, to be completed no later than February 9, 2020. All other dates set forth in the Second Supplemental Pre-trial Scheduling Order remain unchanged.

IT IS SO ORDERED.

Dated: January 5, 2021

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

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