| 1 | CHARLES S. PAINTER (SBN 89045) | | |
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| 5 | Attorneys for Defendant, ESA MANAGEMENT, LLC, a Delaware | | |
| 6 | limited liability company | | |
| 7 | | | |
| 8 | UNITED STATES DISTRICT COURT | | |
| 9 | EASTERN DISTRICT OF CALIFORNIA | | |
| 10 | | | |
| 11 | FERDINA BUIE, | Case No.: 2:17-cv-02455-MCE-AC | |
| 12 | Plaintiff, | JOINT STIPULATION TO MODIFY | |
| 13 | vs. | SCHEDULING ORDER; AND ORDER | |
| 14 | ESA MANAGEMENT, LLC, | | |
| 15 | Defendant. | | |
| 16 | | | |
| 17 | WHERE AS Plaintiff filed her complaint | on January 10, 2017 | |
| 18 | WHEREAS Plaintiff filed her complaint on January 10, 2017; WHEREAS on May 30, 2017, the parties dismissed, without prejudice, all defendants | | |
| 19 | | | |
| | except defendant, ESA MANAGEMENT, LLC; | | |
| 20 | WHEREAS on November 20, 2017, Defendant ESA MANAGEMENT, LLC filed a | | |
| 21 | Notice of Removal; WHEREAS on November 21, 2017, this count issues its Pro Trial Schoduling Order | | |
| 22 | WHEREAS on November 21, 2017, this court issues its Pre-Trial Scheduling Order | | |
| 23 | which indicated, among other things, " that this order shall not be modified except by leave o | | |
| 24 | court upon a showing of good cause "; | | |
| 25 | WHEREAS discovery non-expert was previously scheduled to close on November 20 | | |
| 26 | 2018, but was extended to be complete by January 28, 2019 per stipulation signed by Judge | | |
| 27 | England on November 26, 2018, which moved forward previous deadlines; and | | |
| 28 | | | |
| | | | |

| 1 | WHEREAS neither party will be filing a dispositive motion and whereas both parties are | | |
|----|-----------------------------------------------------------------------------------------------------|---------------------------------------------------------|--|
| 2 | agreeable to attempting to settle this matter before enormous resources, including time and | | |
| 3 | money, are expended in conducting extensive expert discovery, the parties hereby do agree to | | |
| 4 | extend the deadline to complete expert discovery to October 30, 2019 in order to provide the | | |
| 5 | parties ample time to hold a mediation, if settlement talks are unsuccessful between the attorneys. | | |
| 6 | DATED: May 8, 2019 | | |
| 7 | | ERICKSEN ARBUTHNOT | |
| 8 | Ву | /s/ Rebecca L. Menendez | |
| 9 | | CHARLES S. PAINTER | |
| 10 | | REBECCA L. MENENDEZ Attorneys for Defendant, ESA | |
| 11 | | MANAGEMENT, LLC, a Delaware limited liability company | |
| 12 | DATED: May 22, 2019 | | |
| 13 | | AMERIO LAW FIRM, PC. | |
| 14 | By | /s/ Jeffrey Fletterick | |
| 15 | | ASHLEY R. AMERIO JEFFREY FLETTERICK | |
| 16 | | STEPHEN F. DAVIDS Attorneys for Plaintiff, FERDINA BUIE | |
| 17 | | Automeys for Flumnin, FERDITAL DOLL | |
| 18 | ORDER | | |
| 19 | Pursuant to the Parties' stipulation and fo | or good cause, the deadline to complete expert | |
| 20 | discovery is extended to October 30, 2019. | or good eduse, the dedamine to complete expert | |
| 21 | IT IS SO ORDERED. | | |
| 22 | Dated: May 23, 2019 | | |
| 23 | Dated. May 23, 2019 | 1/2 088 | |
| 24 | | MORRISON C. ENGLAND. JR | |
| 25 | | UNITED STATES DISTRICT JUDGE | |
| 26 | | | |
| 27 | | | |
| 28 | | | |