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Attorneys for Defendant
JETBLUE AIRWAYS CORPORATION

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION

MICHELLE HILL, an individual,
ARIEL EPSTEIN POLLACK, an individual,

Plaintiffs,

v.

JETBLUE AIRWAYS CORPORATION, a
Delaware corporation,

Defendant.

ERICKA BOHNEL, an individual,
ROSA MARTINEZ, an individual,

Plaintiffs,

v.

JETBLUE AIRWAYS CORPORATION, a
Delaware corporation,

Defendant.

) Case No.: 2:17-cv-01604-WBS-DB
)
) **STIPULATION REGARDING**
) **PRETRIAL DEADLINES**

) Case No.: 2:18-cv-00081-WBS-DB

1 Defendant JETBLUE AIRWAYS CORPORATION ("JetBlue") and Plaintiffs MICHELLE
2 HILL and ARIEL EPSTEIN POLLACK and ERIKA BOHNEL and ROSA MARTINEZ
3 (collectively, "Plaintiffs") stipulate as follows:

4 **Stipulation**

5 WHEREAS, the Court entered the current scheduling orders on September 11, 2020 [*Hill*
6 ECF No. 47; *Bohnel* ECF No. 40].

7 WHEREAS, the parties expect to complete depositions of most JetBlue-affiliated witnesses
8 and Plaintiffs' disclosed damages witnesses by the end of this month. However, two of Plaintiffs'
9 damages witnesses have requested to reschedule their depositions originally set for this week and
10 the parties are trying to subpoena two other witnesses.

11 WHEREAS, JetBlue has subpoenaed medical records from Plaintiffs' new and recently
12 disclosed providers and requested updated records for recent treatment received from previously
13 disclosed providers but has not yet received those records, deposed providers, or been able to
14 proceed with Independent Medical Examinations. Plaintiffs have requested the details for IMEs,
15 and JetBlue has not yet provided them.

16 WHEREAS, the parties each also have several discovery disputes that they anticipate
17 requiring the Court's assistance to resolve.

18 WHEREAS, the parties have met and conferred and agree on an extension of pre-trial
19 deadlines as indicated below to provide time for the parties to complete fact discovery. The
20 contemplated extension will not involve an extension of the trial dates in the above captioned
21 matters.

22 WHEREAS, the parties have also agreed to bring all outstanding discovery disputes before
23 the Court on May 28, 2021. The parties agree to cooperate in exchanging joint statements and
24 meeting and conferring, both consistent with the Court's rules, in advance of the hearing and on the
25 below schedule.

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THEREFORE, the parties request the Court enter an order setting the following deadlines:

<u>2:17cv1604: Hill/Pollack</u>	<u>Current</u>	<u>Proposed</u>
Parties exchange respective portions of joint statement on any outstanding discovery issues	N/A	5/10/2021
Return drafts responding to other's argument	N/A	5/17/2021
Provide any further edits to own party's section(s)	N/A	5/19/2021
File joint notice of hearing and joint statement	N/A	5/21/2021
Hearing on Discovery Issues	N/A	5/28/2021 at 10:00 a.m.
Fact Discovery Cutoff	4/30/2021	6/14/2021
Expert Disclosures	5/31/2021	7/30/2021
Deadline to Mediate	8/9/2021	7/1/2021 ¹
Expert Rebuttals	6/21/2021	8/13/2021
Expert Discovery Cutoff	7/19/2021	9/17/2021
Dispositive Motions filed	8/9/2021	10/4/2021
Pretrial Conference	11/8/2021 at 1:30 p.m.	12/6/2021, at 1:30 p.m.
Trial	1/25/2022 at 9:00 a.m.	2/23/2022, at 9:00 a.m.

<u>2:18cv0081: Bohnel/Martinez</u>	<u>Current</u>	<u>Proposed</u>
Parties exchange respective portions of joint statement on any outstanding discovery issues	N/A	5/10/2021
Return drafts responding to other's argument	N/A	5/17/2021
Provide any further edits to own	N/A	5/19/2021

¹ Subject to mediator, client, and counsel availability.

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party's section(s)		
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Expert Discovery Cutoff	7/19/2021	9/17/2021
Dispositive Motions filed	8/9/2021	10/4/2021
Pretrial Conference	1/18/2022 at 1:30 PM	1/18/2022, at 1:30 PM
Trial	3/29/2022 at 9:00 AM	3/29/2022, at 9:00 AM

IT IS SO STIPULATED.

Dated: April 30, 2021

Respectfully submitted,

/s/Rachel M. Luke (as authorized on April 29, 2021)

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IT IS SO ORDERED.

Dated: May 3, 2021


WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE