

1 **THOMAS J. DALY, CA Bar No. 119684**
 TDaly@lrrc.com
 2 **DREW WILSON, CA Bar No. 283616**
 DWilson@lrrc.com
 3 **LEWIS ROCA ROTHGERBER CHRISTIE LLP**
 4 **655 N. Central Avenue, Suite 2300**
Glendale, CA 91203-1445
 5 **Telephone: (626) 795-9900**
Facsimile: (626) 577-8800

6 Attorneys for Plaintiff
 MOBILE HI-TECH WHEELS
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8 UNITED STATES DISTRICT COURT
 9 EASTERN DISTRICT OF CALIFORNIA
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11 MOBILE HI-TECH WHEELS,
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 Plaintiff,
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14 vs.

15 TWM WHOLESALE, LLC and
 TIRE & WHEEL MASTER, INC.;
 TIRE & WHEEL MASTER, LLC;
 16 USA WHEEL & TIRE OUTLET, INC.;
 ASLAM PROPERTY, INC.;
 17 HB COMMERCIAL, LLC; NADEEM ASLAM;
 and AMMAD HUSSAIN,
 18
 Defendants.
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Case No. 2:18-cv-00339-MCE (GGHx)

**STIPULATED REQUEST TO EXTEND
 DISCOVERY DEADLINES; ORDER
 THEREON**

Hon. Morrison C. England, Jr.

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 21 Plaintiff Mobile Hi-Tech Wheels (“MHT”) and Defendants TWM Wholesale, LLC,
 22 Tire & Wheel Master Inc., Tire & Wheel Master LLC, USA Wheel & Tire Outlet Inc.,
 23 USA Wheel & Tire Outlet, Inc., Aslam Property, Inc., HB Commercial, LLC, Nadeem
 24 Aslam, and Ammad Hussain (collectively, “Defendants”), by and through their
 25 respective counsel, hereby jointly request that the Court extend the discovery deadline
 26 to permit discovery to be completed by all Parties.
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655 North Central Avenue
 Suite 2300
 Glendale, CA 91203-1445

Lewis Roca
 ROTHGERBER CHRISTIE

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In support of this stipulated request, the Parties submit the following:

1. The deadline for fact discovery to be completed was February 12, 2019.
2. The Parties have been working in good faith to complete discovery in a timely manner.
3. The Parties have not completed all discovery due to continuing scheduling conflicts.
4. The Parties have pending cross motions for summary judgment that have the potential to simplify discovery and narrow the scope of the case.

WHEREFORE, the Parties respectfully request that the Court extend the discovery deadlines as follows:

1. The deadline for fact discovery to be completed be extended to May 30, 2019.
2. The deadline for the designation of experts be extended to June 30, 2019.
3. The deadline for supplemental list of expert witnesses be extended to July 30, 2019.
4. The deadline to submit the Joint Notice of Trial Readiness (if the parties do not intend to file dispositive motions) be extended to August 30, 2019.
5. The deadline for dispositive motions to be extended to August 30, 2019.

IT IS SO STIPULATED.

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655 North Central Avenue
Suite 2300
Glendale, CA 91203-1445

Lewis Roca
ROTHGERBER CHRISTIE

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Dated: March 20, 2019

Respectfully submitted,

LEWIS ROCA ROTHGERBER
CHRISTIE LLP

By /s/Thomas J. Daly
Thomas J. Daly
Drew Wilson

Attorneys for Plaintiff
MOBILE HI-TECH WHEELS

Dated: March 20, 2019


BRADFORD, LTD.

By /s/Aaron P. Bradford
Aaron P. Bradford
(as authorized on 3/20/2019)

Attorneys for Defendants
TWM WHOLESAL, LLC and
TIRE & WHEEL MASTER, INC.;
TIRE & WHEEL MASTER, LLC;
USA WHEEL & TIRE OUTLET, INC.;
ASLAM PROPERTY, INC.;
HB COMMERCIAL, LLC; NADEEM
ASLAM; and AMMAD HUSSAIN

IT IS SO ORDERED.

Dated: March 28, 2019


MORRISON C. ENGLAND, JR.
UNITED STATES DISTRICT JUDGE