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 21 RIVER PINES PUBLIC UTILITY DISTRICT,  
 22 CANDI BINGHAM and CATHY LANDGRAF

23 UNITED STATES DISTRICT COURT  
 24 EASTERN DISTRICT OF CALIFORNIA  
 25 SACRAMENTO DIVISION

26 GREG GUINA,

27 Plaintiff,

28 v.

RIVER PINES PUBLIC UTILITY DISTRICT;  
 CANDI BINGHAM, an individual; CATHY  
 LANDGRAF, an individual,

Defendants.

**Case No. 2:18-cv-00530-KJM-EFB**

**JOINT STIPULATION AND REQUEST  
 FOR CONTINUANCE OF CERTAIN  
 PRETRIAL DEADLINES AND ORDER**

Complaint filed: March 12, 2018  
 Trial Date: TBD

Plaintiff GREG GUINA (“Plaintiff”) and Defendants RIVER PINES PUBLIC UTILITY DISTRICT (“Defendant RPPUD”), CANDI BINGHAM (“Defendant Bingham”), and CATHY LANDGRAF (“Defendant Landgraf”), (collectively referred to as “the Parties”), through counsel,

1 hereby enter into the following Stipulation and request the Court to extend certain pretrial discovery  
2 deadlines, pursuant to the applicable Local Rules:

3 1. This is an action for alleged violations of civil rights, retaliation, hostile work  
4 environment and wrongful termination. The Parties have been engaged in extensive discovery  
5 including exchanging significant written discovery and conducting depositions of all the Parties.  
6 The completion of the discovery to date has been delayed by health issues suffered by Plaintiff's  
7 counsel Steven Fink.

8 2. With the discovery completed to date, the Parties have agreed to participate in mediation  
9 before retired Federal Judge Raul Ramirez. The Parties are in the process of selecting a date with  
10 Judge Ramirez and expect mediation to occur within the next 60 days.

11 3. The Parties require additional discovery to be completed, including numerous  
12 depositions of third party witnesses, to adequately prepare if the matter should proceed to the filing  
13 of a dispositive motion and/or trial. The Parties ability to complete the mediation and the additional  
14 required discovery will be delayed due to a health issue with Defendant's lead counsel Michael J.  
15 Christian and an anticipated surgical procedure.

16 4. In order to allow time to mediate the case and complete the necessary discovery, the  
17 Parties request that the discovery including discovery motion cut off dates and the expert disclosure  
18 cut off dates should be continued to a date in the future. The Parties hereby stipulate to the  
19 following new discovery dates and expert discovery and request the Court modify the scheduling  
20 order accordingly:

<b>Category</b>	<b>Original Deadline</b>	<b>Proposed Deadline</b>
Discovery Cut Off	July 1, 2019	November 1, 2019
Expert Disclosure	July 15, 2019	November 15, 2019
Rebuttal Experts	August 29, 2019	December 30, 2019
Expert Discovery Cutoff	October 13, 2019	February 13, 2020
Dispositive Motions	December 4, 2019	April 10, 2020

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5. There have been no prior requests for extensions of time to change the case scheduling order (Docket number 15) and to extend time for completion of the alternative dispute resolution.

Trial is currently not set.

Respectfully submitted,

Dated: June 21, 2019

By: /s/ John K. Crowley [as auth. 6.21.19]  
Steven M. Fink  
John Kevin Crowley

Attorneys for Plaintiff  
GREG GUINA

Dated: June 21, 2019

JACKSON LEWIS P.C.

By: /s/ Michael J. Christian  
Michael J. Christian

Attorneys for Defendants  
RIVER PINES PUBLIC UTILITY  
DISTRICT, CANDI BINGHAM and  
CATHY LANDGRAF

**ORDER**

IT IS SO ORDERED.

DATED: June 27, 2019.

  
UNITED STATES DISTRICT JUDGE