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8 [ADDITIONAL COUNSEL ON NEXT PAGE]

9 UNITED STATES DISTRICT COURT
 10 EASTERN DISTRICT OF CALIFORNIA
 11

12 DANIEL ALLEN, an individual)	Case No. 2:18-cv-00706-TLN-CKD
)	
13 Plaintiff,)	STIPULATION AND ORDER
14 v.)	REGARDING
)	DISCOVERY DATES
15 PALADIN CONSULTING, INC., a Texas)	
16 Corporation; XEROX CORPORATION, a New York)	
17 Corporation; GEE GROUP, INC., an Illinois)	
18 Corporation; GENERAL EMPLOYMENT)	
19 ENTERPRISE, INC., an Illinois Corporation; and)	
20 Does 1-20, inclusive,)	
)	
21 Defendants.)	

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17 Attorneys for Defendants
PALADIN CONSULTING, INC
18 GEE GROUP, INC., and GENERAL
EMPLOYMENT ENTERPRISES, INC.

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1 The parties, through their respective counsel, hereby stipulate as follows:

2 WHEREAS, Plaintiff brought this action relating to his former employment against the
3 following entities: PALADIN CONSULTING, INC., a Texas Corporation; XEROX
4 CORPORATION, a New York Corporation; GEE GROUP, INC., an Illinois Corporation;
5 GENERAL EMPLOYMENT ENTERPRISE, INC., an Illinois Corporation; and Does 1-20,
6 inclusive, on February 6, 2018; and

7 WHEREAS, Defendant XEROX CORPORATION filed their Answer on April 6, 2018; and

8 WHEREAS, Plaintiff filed an amended complaint on April 27, 2018; and

9 WHEREAS, Defendant XEROX CORPORATION filed their answer to Plaintiff's First
10 Amended Complaint on May 14, 2018; and

11 WHEREAS, Defendant PALADIN CONSULTING, INC, GEE GROUP, INC., and
12 GENERAL EMPLOYMENT ENTERPRISE, INC., filed their answer to Plaintiff's First Amended
13 Complaint on May 11, 2018; and

14 WHEREAS, the parties have exchanged and are conducting written discovery; and

15 WHEREAS, Plaintiff suffered a stroke on or about August, 2018; and

16 WHEREAS, Plaintiff's stroke affected his speech such that he was unable to have his
17 deposition taken in this matter as previously planned; and

18 WHEREAS, because of this delay and out of a professional courtesy to Defendants,
19 Plaintiff's counsel has intentionally not moved forward with depositions of Defendants' employees;
20 and

21 WHEREAS, Plaintiff and Defendants agreed to stipulate to continue Discovery and
22 Mediation deadlines; and

23 WHEREAS, Plaintiff has now recovered sufficiently to have his deposition taken in this
24 matter; and

25 WHEREAS, the Court has ordered the parties to provide new discovery dates; and

26 THEREFORE, the Parties hereby stipulate and request as follows: 27

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1 The Court set the Discovery Cut-Off date for April 17, 2020;

2 The Court set the Expert Disclosures Cut-Off date for May 18, 2020;

3 The Court set the Supplemental/Rebuttal Expert Disclosures Cut-Off date for June 23, 2020.

4
5 Date: October 30, 2019

**LAW OFFICES OF JEREMY PASTERNAK
A Professional Corporation**

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8 By: /s/ Morgan Yang
JEREMY PASTERNAK
MORGAN YANG
Attorneys for Plaintiff
DANIEL ALLEN

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10
11 Date: October 30, 2019

THE KULLMAN FIRM, PLC

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13 By: /s/ Rachel Linzy (with permission)
HEATHER HEARNE
RACHEL E. LINZY
Attorneys for Defendant
XEROX CORPORATION

14
15 Date: October 30, 2019

**CONSTANGY, BROOKS, SMITH, &
PROPHETE, LLP**

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17
18
19 By: /s/ Jasmine Anderson (with permission)
SARAH E. ROBERTSON
JASMINE L. ANDERSON
Attorneys for Defendant
PALADIN CONSULTING, INC; GEE
GROUP, INC., and GENERAL
EMPLOYMENT ENTERPRISES, INC.

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ORDER

The Court, having reviewed having reviewed the Stipulation of the parties and Request for Order, and GOOD CAUSE HAVING BEEN SHOWN, hereby orders:

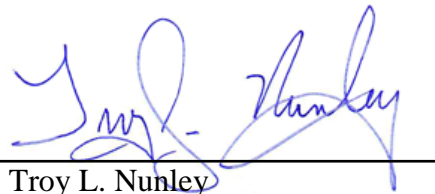
The Discovery Cut-Off date be set for April 17, 2020;

The Expert Disclosures Cut-Off date be set for May 18, 2020;

The Supplemental/Rebuttal Expert Disclosures Cut-Off date be set for June 23, 2020.

IT IS SO ORDERED.

Dated: October 31, 2019



Troy L. Nunley
United States District Judge