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6 **Attorney for Plaintiff**
7 **DANIEL ALLEN**

8 [ADDITIONAL COUNSEL ON NEXT PAGE]

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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

DANIEL ALLEN, on behalf of
himself,

Plaintiff,

v.

PALADIN CONSULTING, INC., a
Texas Corporation; XEROX
CORPORATION, a New York
Corporation; GEE GROUP, INC., an
Illinois Corporation; GENERAL
EMPLOYMENT ENTERPRISES,
INC., an Illinois Corporation; and Does
1-20, inclusive.

Defendants.

No. 2:18-cv-00706-TLN-CKD

**STIPULATION AND ORDER
CONTINUING PENDING
DISCOVERY DEADLINES**

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17 **XEROX CORPORATION**

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27 **Attorneys for Defendants**
28 **PALADIN CONSULTING, INC**
GEE GROUP, INC., and GENERAL
EMPLOYMENT ENTERPRISES, INC.

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TO THE COURT AND ALL PARTIES OF RECORD:

PLEASE TAKE NOTICE THAT, as a result of the unprecedented travel and safety restrictions relating to the Coronavirus (“COVID-19”), and in the interest of protecting the health, safety, and wellbeing of all parties, witnesses, attorneys and court personnel, Plaintiff Daniel Allen (“Plaintiff”) and Defendants Paladin Consulting, Xerox Corporation, Gee Group, Inc., and General Employment Enterprises, Inc. (“Defendants”), (collectively, the “Parties”) hereby agree and stipulate to extend all hearings, discovery deadlines, depositions, and other case related deadlines currently set by four (4) months.

This Stipulation is intended to expressly apply to all dates the Parties had previously stipulated to, pursuant to their October 31, 2019, April 14, 2020, and August 14, 2020 Stipulations. Therefore, the Parties hereby stipulate and request as follows:

- The Court set the Discovery Cut-Off date for April 19, 2021;
- The Court set the Expert Disclosures Cut-Off date for May 17, 2021;
- The Court set the Supplemental/Rebuttal Expert Disclosures Cut-Off date for June 21, 2021.

The Parties shall file a joint report on the status of all case related deadlines to the Court every 60 days following the approval of this Stipulation and [Proposed] Order.

IT IS SO STIPULATED:

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Dated: January 15, 2021

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

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

Dated: January 12, 2021

THE KULLMAN FIRM, PLC

By: /s/ Rachel E. Linzy (with permission 1/12/21)
HEATHER HEARNE
RACHEL E. LINZY
Attorneys for Defendant
XEROX CORPORATION

Dated: January 15, 2021

**COSTANGY, BROOKS, SMITH, & PROPHETE,
LLP**

By: /s/ Jasmine L. Anderson (with permission 1/15/21)
SARAH E. ROBERTSON
JASMINE L. ANDERSON
Attorneys for Defendant
PALADIN CONSULTING, INC; GEE
GROUP, INC., and GENERAL
EMPLOYMENT ENTERPRISES, INC.

1 **ORDER**

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

5 The Discovery Cut-Off date is re-set for April 19, 2021;

6 The Expert Disclosures Cut-Off date is re-set for May 17, 2021;

7 The Supplemental/Rebuttal Expert Disclosures Cut-Off date is re-set for June
8 21, 2021.

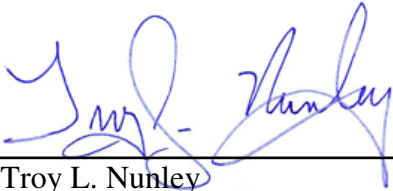
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10 **IT IS SO ORDERED.**

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13 Dated: January 19, 2021

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16 Troy L. Nunley
17 United States District Judge

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