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11 **UNITED STATES DISTRICT COURT**
12 **EASTERN DISTRICT OF CALIFORNIA**
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14 JAMES J. SULLIVAN III; JAHANSHIR J.)
15 JAVANIFARD; GAYLE JAVANIFARD;)
16 DANIEL H. SAYAH; SULLIVAN III, LLC, a)
17 California limited liability company;)
18 MALKAH J, LLC, a California limited)
19 liability company; PETER P. PEREZ and)
20 GLORIA A. PEREZ, as trustees of the PETER)
21 PAUL AND GLORIA ANN PEREZ FAMILY)
22 REVOCABLE TRUST established April 25,)
23 2013)

24 Plaintiffs,

25 v.

26 THE UNITED STATES OF AMERICA and)
27 UNION PACIFIC RAILROAD COMPANY,)
28 a Delaware corporation)

Defendants.

CASE NO.: 18-cv-03066-MCE

**STIPULATION TO EXTEND TIME TO
COMPLETE RULE 26(f) CONFERENCE;
ORDER THEREON**

Complaint Filed: November 27, 2018

1 **RECITALS**

2 WHEREAS, on November 27, 2018, Plaintiff James J. Sullivan III, et al. (“Sullivan”)
3 commenced the above-captioned action by filing a Complaint to Quiet Title and for Declaratory
4 Relief (“Complaint”) against Defendants United States of America (“United States”) and Union
5 Pacific Railroad Company (“Union Pacific”). (ECF No. 1.)

6 WHEREAS, on August 11, 2020, the Court entered its order dismissing the United States
7 as a party to the action leaving only plaintiffs and Union Pacific. (ECF No. 34.)

8 WHEREAS, since early January 2019, respective counsel for Sullivan and UP have been
9 meeting and conferring regarding the action in an effort to reach an amicable resolution of this
10 matter.

11 WHEREAS, the deadline for the parties to meet and confer pursuant to Rule 26(f) is
12 November 16, 2020.

13 WHEREAS, respective counsel for Sullivan and Union continue engaging in discussions
14 and efforts aimed at reaching a non-judicial resolution of this matter.

15 WHEREAS, in light of these ongoing settlement efforts, Sullivan and Union Pacific
16 agree that the deadline for the parties to meet and confer as required by Federal Rule of Civil
17 Procedure 26(f) should be further continued to January 29, 2021.

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19 **STIPULATION**

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21 IT IS HEREBY STIPULATED by and between Sullivan, by and through its counsel of
22 record, Gordon W. Egan of Signature Law Group, LLP, and Union Pacific by and through its
23 counsel of record, Nancy J. Johnson of Berliner Cohen, that the parties shall have until January
24 29, 2021 to meet and confer as required by Federal Rule of Civil Procedure 26(f) regarding their
25 discovery plan.

26 DATED: November 16, 2020

SIGNATURE LAW GROUP LLP

27 By: /s/ Gordon W. Egan _____
28 GORDON W. EGAN
Attorney for James J. Sullivan III, et al

1 DATED: November 16, 2020

BERLINER COHEN, LLP

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3 By: /S/ Nancy J. Johnson (as authorized on 11-16-
4 2020)

5 NANCY J. JOHNSON
6 Attorneys for Defendant Union Pacific
7 Railroad Company

8
9 **ORDER**

10 Pursuant to the stipulation between the parties, (ECF No. 37), and good cause appearing,
11 the parties shall have until January 29, 2021, to meet and confer as required by Federal Rule of
12 Civil Procedure 26(f) regarding their discovery plan.

13 IT IS SO ORDERED.

14 Dated: November 20, 2020



15 MORRISON C. ENGLAND, JR.
16 SENIOR UNITED STATES DISTRICT JUDGE
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