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13 IN THE UNITED STATES DISTRICT COURT
14 FOR THE EASTERN DISTRICT OF CALIFORNIA

15
16 BRUCE CUNNINGHAM,
17 Plaintiff,
18 v.
19 UNITED STATES OF AMERICA,
20 Defendant.

CASE NO. 2:19-CV-01580-WBS-CKD

**THIRD STIPULATION TO
EXTEND DISCOVERY, MOTION
AND TRIAL DEADLINES; AND
ORDER**

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23 The parties to the above-captioned case hereby stipulate to again extend the discovery,
24 motion, and trial deadlines as follows in light of the COVID-19 public health emergency.

25 Under the current Status (Pretrial Scheduling) Order, the pertinent deadlines are as follows:

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STIPULATION AND ORDER TO EXTEND DISCOVERY, MOTION, AND TRIAL DEADLINES

1	Plaintiff's Disclosure of Experts and Reports:	January 7, 2021
2	Defendant's Disclosure of Experts and Reports:	February 5, 2021
3	Rebuttal Expert Disclosure and Reports:	March 5, 2021
4	Discovery Cut-Off:	April 30, 2021
5	Motions to Compel Must Be Heard By:	April 2, 2021
6	Dispositive Motions Shall Be Filed By:	May 7, 2021
7	Pretrial Conference:	August 16, 2021
8	Trial:	October 13, 2021

9 The current national health crisis related to the coronavirus has made thorough and complete
10 discovery, including the scheduling an independent medical evaluation, extremely difficult. In light
11 of this unprecedented situation, which will be of unknown duration, the parties submit that good
12 cause exists to modify the schedule. Based on the information currently available, including the fact
13 that the parties have stipulated to inclusion of this case in the Court's Voluntary Dispute Resolution
14 Program ("VDRP"), the parties stipulate and respectfully request that the Court modify the
15 discovery, motion, and trial deadlines as follows:

17	Plaintiff's Disclosure of Experts and Reports:	June 4, 2021
18	Defendant's Disclosure of Experts and Reports:	July 9, 2021
19	Rebuttal Expert Disclosure and Reports:	August 6, 2021
20	Discovery Cut-Off:	September 10, 2021
21	Motions to Compel Must Be Heard By:	September 3, 2021
22	Dispositive Motions Shall Be Filed By:	October 15, 2021
23	Pretrial Conference:	January 31, 2022, at 1:30 p.m.
24	Trial:	March 29, 2022, at 9:00 a.m.

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Dated: November 17, 2020

Respectfully submitted,
McGREGOR W. SCOTT
United States Attorney

/s/ Edward A. Olsen
EDWARD A. OLSEN
Assistant United States Attorney
Attorneys for the United States

Dated: November 17, 2020

/s/ Kirk J. Wolden
Kirk J. Wolden
CARTER WOLDEN CURTIS, LLP
Attorneys for Plaintiff

ORDER

Pursuant to stipulation, IT IS SO ORDERED.

Dated: November 18, 2020


WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE