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11 VICTORIA’S SECRET STORES, LLC

12 UNITED STATES DISTRICT COURT
13 EASTERN DISTRICT OF CALIFORNIA

14 KELLY MOLINA,
15 Plaintiff,
16 vs.
17 VICTORIA’S SECRET STORES,
18 LLC and DOES 1 through 25,
19 Defendants.

Case No. 2:19-cv-02117-MCE-EFB

**STIPULATION AND ORDER RE:
MODIFICATION TO JOINT RULE
26(f) REPORT DEADLINES**

Action Filed: 09/13/2019

20 The parties to the above entitled action have met and conferred with respect to
21 pending deadlines in this matter. Given the difficulties in completing fact discovery
22 during shelter in place orders the parties have stipulated to and propose to the Court a
23 thirty (30) day extension to complete non expert discovery and continue all other dates as
24 a result of this extension.

25 The stipulation, if approved by the Court, would modify the dates as follows:

	<u>Current Date</u>	<u>New Date</u>
Non-expert Discovery cutoff	10/19/2020	11/18/2020
Expert Disclosure/Reports	12/18/2020	1/19/2021
Supplemental Experts	1/18/2021	2/18/2021

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Notice of Trial Readiness	2/18/2021	3/22/2021
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There have no prior requests for extension of time in this matter and no pending Court hearings.

The parties respectfully request the Court approve the proposed order.

ECF CERTIFICATION

I, Richard D. Silvestri, certify that the content of this document is acceptable to the undersigned counsel of record to affix my electronic signature hereto.

Dated: October 9, 2020

GAVRILOV & BROOKS

By: /s/
RICHARD D. SILVESTRI
Attorneys for Plaintiff KELLY MOLINA

ECF CERTIFICATION

I, James F. Hetherington, certify that the content of this document is acceptable to the undersigned counsel of record to affix my electronic signature hereto.

DATED: October 16, 2020

GOODMAN NEUMAN HAMILTON LLP

By: /s/
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ORDER

In accordance with the foregoing stipulation of the parties, and good cause appearing, the proposed extension of time is approved. The new Rule 26(f) deadlines are as follows:

Non-Expert Discovery Cutoff: November 18, 2020

Expert Disclosure/Reports: January 19, 2021

Supplemental Experts: February 18, 2021

Notice of Trial Readiness: March 22, 2021

IT IS SO ORDERED.

Dated: October 16, 2020



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

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