

1 Wyeth E. Burrows (State Bar No. 203851)
Wburrows@wshblaw.com
2 Zhasmina Y. Kolarova (State Bar No. 328751)
zkolarova@wshblaw.com
3 **WOOD, SMITH, HENNING & BERMAN LLP**
501 West Broadway, Suite 1200
4 San Diego, California 92101
Wburrows@wshblaw.com
5 Phone: 619-849-4900 ♦ Fax: 619-849-4950

6 Attorneys for Defendant, WESTERN DENTAL SERVICES, INC.

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UNITED STATES DISTRICT COURT

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EASTERN DISTRICT OF CALIFORNIA, SACRAMENTO DIVISION

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KIMBERLEE PRINGLE,

Case No. 2:19-cv-02190-MCE-DB

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Plaintiff,

**STIPULATION AND ORDER TO
STAY LITIGATION UNTIL
COMPLETION OF MEDIATION**

12

v.

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WESTERN DENTAL SERVICES,
INC.,

Hon. District Judge Morrison C.
England, Jr.

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Defendant.

Hon. Magistrate Judge Deborah Barnes

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Trial Date: None Set

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This Stipulation is entered into by and between Plaintiff KIMBERLEE PRINGLE (hereinafter "Plaintiff") and Defendant WESTERN DENTAL SERVICES, INC. (hereinafter "Defendant") (Plaintiff and Defendant are collectively referred to herein as the "Parties" or singularly as the "Party"), by and through their respective counsel, with reference to the following facts:

1. The Parties have a mediation scheduled for October 16, 2020.
2. The Parties wish to stay all discovery and any pending litigation due dates in the instant action until after October 16, 2020.
3. If the Parties do not settle the case in mediation on October 16, 2020, the Parties will only have 40 days left until the fact discovery cut off deadline.
4. If all discovery and any pending litigation is not stayed, the Parties will not have adequate time to conduct discovery and retain experts. Thus, good cause

1 exists to stay all discovery and any due dates in the pending litigation until the
2 completion of mediation on October 16, 2020.

3 5. For the reasons discussed herein, the parties have agreed to stay
4 discovery and this action until after October 16, 2020.

5 6. Following compliance, the parties will advise the Court and take all
6 necessary steps to bring this action to a close, as appropriate.

7 Based on the foregoing, the Parties, by and through their respective counsel of
8 record, hereby STIPULATE and AGREE as follows:

- 9 1. All discovery in this action shall be stayed pending mediation; and
10 2. The Parties shall mediate this matter on October 16, 2020, with mediator,
11 Jill Sperber.

12 Dated: September 9, 2020 MARTIN & BONTRAGER, APC

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14 By: /s/ Nicholas J. Bontrager
15 Nicholas J. Bontrager
16 Attorneys for Plaintiff,
KIMBERLEE PRINGLE

17 DATED: September 9, 2020 WOOD, SMITH, HENNING & BERMAN LLP

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20 By: /s/ Zhasmina Y. Kolarova
21 WYETH E. BURROWS
22 ZHASMINA Y. KOLAROVA
23 Attorneys for Defendant, WESTERN DENTAL
SERVICES, INC.

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WOOD, SMITH, HENNING & BERMAN LLP
Attorneys at Law
501 WEST BROADWAY, SUITE 1200
SAN DIEGO, CALIFORNIA 92101
TELEPHONE 619-849-4900 ♦ FAX 619-849-4950

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Signature Attestation

Pursuant to Civil Local Rule 5-4.3.4(i), I hereby attest that all other signatories listed, whose signatures are indicated by a conformed signature (“/s/”), and on whose behalf the filing is submitted, concur in the filing’s content and have authorized the filing.

DATED: Spetember 9, 2020

WOOD, SMITH, HENNING & BERMAN LLP

By: /s/ Zhasmina Y. Kolarova

WYETH E. BURROWS
ZHASMINA KOLAROVA

Attorneys for Defendant, WESTERN DENTAL SERVICES, INC.

ORDER

IT IS SO ORDERED.

Dated: September 14, 2020



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